



California Environmental Protection Agency  
Department of Toxic Substances Control

HAZARDOUS WASTE FACILITY PERMIT

**Facility Name:**

United States of America  
Department of the Navy  
Naval Air Station  
Alameda, California 94501-5000

**Facility Owner:**

U.S. Navy  
Commander BRAC Operations  
1220 Pacific Highway  
San Diego, California 92132

**Facility EPA ID Number:**

CA2 170 023 236

**Effective Date:** July 24, 1993

**Expiration Date:** July 24, 2003

**Modification Number:**

**Modification Effective Date:**

Pursuant to Section 25200 of the California Health and Safety Code, the Hazardous Waste facility Permit is hereby issued to U.S. Navy, Naval Air Station, Alameda, effective July 24, 1993, **is hereby modified. The details of the modifications are listed in Appendices 4 and 5. The modified permit consists of xxxx pages including the cover page, Attachment A and Appendices.**

Mohinder S. Sandhu, P.E., Chief  
Standardized Permits and Corrective Action  
Branch

Date

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ATTACHMENT A  
Hazardous Waste Facility Permit

NAVAL AIR STATION, ALAMEDA  
WEST END OF ALAMEDA ISLAND  
ALAMEDA, CALIFORNIA 94501-5000  
EPA ID No. CA 217023236

**I. DESCRIPTION OF FACILITY**

**A. Ownership, Operations, and Location**

Naval Air Station (NAS), Alameda, (The "Station"), hereinafter referred to "owner and/or operator", has applied to the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) for a Hazardous Waste Facility Permit to continue operating a hazardous waste treatment and storage facility, located at West End of Alameda Island, Alameda, Alameda County, California (see Appendix 1 for map).

NAS is one of the major air station complexes of the U.S. Navy on the West Coast. The military regards NAS as the Host Activity. It exists to maintain and operate facilities and provide services and materials to support naval aviation activities. The Station berths and services aircraft carriers and other supporting vessels; repairs, maintains and overhauls aircraft. Within NAS, many "Tenant Activities" exist in order to fulfill these services. Hazardous waste is generated from these services. This Hazardous Waste Permit applies to seven facilities in the Station. These facilities are briefly described below:

Building 13 - This building is in the corner of Fifth Street and Avenue H. The building stores a variety of wastes that are generated from ships, a number of shops, plants and activities in the Station. Most of these wastes are in drums. This Permit allows hazardous wastes to be stored in this building for more than 90 (ninety) days but less than one year.

Yard D-13 - This is an outdoor hazardous waste storage yard located at Ninth Street and Avenue K. The hazardous wastes stored in this yard are generated in plating, auto, ship, engine and aircraft shops and other activities that support the naval fleet. Most of the wastes are stored in 55-gallon drums. The Yard also uses 1,000 gallon "bowsers" and other sized containers to store hazardous waste.

Industrial Wastewater Treatment Plant (IWTP) 5 - This IWTP is located by the south side of Building 5 which is on Avenue F. IWTP is divided into two sections; one section is mainly for accumulating the hazardous wastewater and another section for the treatment of the wastewater. IWTP 5 treats wastewater from the conversion coating and airframes cleaning shop in Building 5. Wastewater from pain spray booths is occasionally disposed in the IWTP. IWTP 5 also receives wastewater from an anodizing operation in Building 167. The wastewaters are contaminated with chromium and sometimes oil. The sludge generated from IWTP 5 is transferred to IWTP 32 for dewatering and disposed off-site. The effluent from IWTP 5 goes into the Station's industrial sewer treatment system which is discharged into the East Bay Municipal Utility District's (EBMUD's) water treatment plant.

Industrial Wastewater Treatment Plant 24 - This IWTP is located north of Building 24, by First Street and Avenue F. IWTP 24 treats wastewater that is generated in Building 24, where corrosion resistant conversion coating and paint are applied to aircraft. The wastewater from conversion coating is contaminated with chromium. IWTP 24 precipitates the chromium and generated a hazardous waste sludge that is dewatered and disposed off-site. The effluent water goes to the Station's industrial sewer treatment system like that of IWTP 5.

Industrial Wastewater Treatment Plant 25 - This IWTP is located south of Building 25 which is northwest of the Seaplane Lagoon. Building 25 is a hangar where aircraft paint stripping occurs. Wastewater from this operation contains paint skins, phenol, oil & grease, other organics, and chromium. The wastewater is processed through IWTP 25 in which the pain chips are filtered, the phenol and organics are absorbed in carbon or destroyed, the oil & grease are separated and the chromium reduced and precipitated. The precipitated sludge is dewatered and disposed off-site, just like the IWTP 5 sludge. The fate of the effluent is similar to that of IWTP5.

Industrial Wastewater Treatment Plant 32 - This IWTP is located indoors, by the western end of Building 32. Building 32 is the Station's electroplating shop. Wastewaters that are generated from this shop are contaminated with chromium, nickel, aluminum, copper, zinc, cadmium, tin, silver, lead and cyanide as well as acidic and caustic waters. Wastewaters are treated in batch, and like the other IWTPs, a hazardous waste sludge is generated which is dewatered and disposed off-site. Cyanide in the effluent is destroyed, and the pH is balanced before the effluent is discharged.

Structure #598 - Structure #598 is located outdoors in Area 37. It is composed of three 25,000 gallon steel, above-ground tanks. This Permit allows the storage of fuel and oily wastes for more than 90 days but less than one year.

Other information on the hazardous wastes managed by NAS can be found in Section III of the Permit.

B. Compliance With California Environmental Quality Act

~~DTSC proposes to issue a Negative Declaration for the project. The Negative Declaration states that, after an initial study conducted in accordance with the California Environmental Quality Act (CEQA), DTSC finds that the project will not have any significant adverse effects on the environment.~~

DTSC issued a Negative Declaration for the initial permit. DTSC, as a responsible agency under CEQA for the Class 3 Permit Modification, prepared a Statement of Findings and a Notice of Determination for the modification to the permit based on environmental documents prepared by the City of Alameda.

## II. GENERAL CONDITIONS

### A. Effect of Permit

1. The issuance of this permit by the California Department of Toxic Substances Control (DTSC) does not release the owner and/or operator from any liability or duty imposed by federal or state statutes and regulations or local ordinances, except the obligation to obtain this permit. In particular, unless otherwise specifically provided in this permit, the owner and/or operator shall comply with the provisions of the Health and Safety Code (H&SC), Division 20, Chapter 6.5 and title 22, California Code of Regulations (CCR), Division 4.5.
2. Issuance of this permit by DTSC does not prevent DTSC from adopting or amending regulations, issuing administrative orders, or obtaining judicial orders which impose requirements which are in addition to or more stringent than those in existence at the time this permit was issued, and does not prevent the enforcement of these requirements against the owner and/or operator of the facility. The owner and/or operator shall comply with any such additional or more stringent requirements in addition to the requirements and conditions specified in the permit. Where appropriate, this permit is also subject to H&SC sections 25159.5 and 25159.6 relating to the incorporation of Federal regulations in the absence of equivalent State regulations.
3. This permit does not convey any property rights of any sort, or any exclusive privilege.

### B. Requirement to Submit Information

All information, reports, submittals, or notices required by the United States Environmental Protection Agency (U.S. EPA) Resource Conservation and Recovery Act (RCRA) permit shall be submitted, if applicable, to DTSC's Region 2 Facility Permitting Branch.

### C. Consent to Entry by Department Representatives

The owner and/or operator, by accepting this permit, consents to entry by any authorized representative of DTSC or of the local health officer at any reasonable hour of the day in order to carry out the purposes of the



Hazardous Waste Control Law, Health and Safety Code section 25100 et seq., including but not limited to the activities listed in title 22, CCR, section 66270.30(i).

D. Specific Conditions

1. The owner and/or operator shall comply with the general facility standards contained in title 22, CCR, Division 4.5, Chapter 14, Article 2.
2. The owner and/or operator shall comply with preparedness and prevention requirements contained in title 22, CCR, Division 4.5, Chapter 14, Article 3.
3. The owner and/or operator shall comply with the contingency plan and emergency procedure requirements contained in title 22, CCR, Division 4.5, Chapter 14, Article 4.
4. The owner and/or operator shall comply with the manifest system, recordkeeping and reporting requirements contained in title 22, CCR, Division 4.5, Article 5 of Chapter 14, sections 66270.30(1) (7), (8) and (9).
5. The owner and/or operator shall comply with the closure and, if applicable, post-closure requirements contained in title 22, CCR, Division 4.5, Chapter 14, Article 7.

E. Land Disposal Restrictions

The owner and/or operator shall comply with applicable provisions of the land disposal restrictions as found in title 22, CCR, Division 4.5, Chapter 18.

The owner and/or operator shall retain on-site, until closure of the facility, a copy of all notices, certifications, demonstrations, waste analyses data, and other documentation related to the management of all wastes (for on-site or off-site treatment, storage or disposal) subject to land disposal restrictions.

The owner and/or operator shall retain on-site, a current waste analysis plan describing how and when wastes or treatment residues will be tested to comply with the land disposal restriction regulations.

F. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the owner and/or operator for a permit modification, revocation and re-issuance, or termination or a notification of anticipated noncompliance or planned changes (except as provided in title 22, CCR, section 66270.42), does not stay any permit condition. Except as provided in title 22, CCR, section 66270.42(a), a new facility permit condition or a modification of an existing facility permit condition shall become effective on the date specified in DTSC's written notice of approval of the permit modification, pursuant to title 22, CCR, sections 66270.42 and/or 66271.14.

G. Need to Halt or Reduce Activity

It shall not be a defense for the owner and/or operator in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

H. Severability

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

I. Permit Expiration

In accordance with title 22, CCR, section 66270.51, this permit and all conditions therein will remain in effect beyond the permit expiration or termination date, until the effective date of a new permit, if the owner or operator has submitted a timely and complete application (both Part A and Part B) for a new permit and, through no fault of the owner or operator, DTSC has not issued a timely and complete application for a new permit shall be submitted at least one-hundred and eighty (180) calendar days before this permit expires, unless permission for a later date is granted in writing by DTSC.

J. 24-Hour Reporting

The owner and/or operator shall report to DTSC any incidents of noncompliance, with the conditions of this permit and any of the provisions of title 22, CCR, Division 4.5 or H&SC, Division 20, Chapter 6.5, which may

endanger health or the environment, pursuant to the reporting requirements in title 22, CCR, section 66270.30(1)(6).

K. Notice of Planned Physical Changes and Certification of Construction

The owner and/or operator shall give notice to DTSC as soon as possible, and at least 30 days in advance of, any planned physical alterations or additions to the permitted facility. In addition, prior to commencement of the treatment, storage, or transfer of hazardous wastes at a new facility or modified portion of an existing facility, the owner and/or operator shall comply with the requirements contained in title 22, CCR, section 66270.30(1)(2).

L. Operation at Night

When the facility is operated during hours of darkness, the owner and/or operator shall provide sufficient lighting to ensure safe, effective management of hazardous wastes.

M. Part B Application (Operation Plan) of the Hazardous Waste Facility Permit Application

1. By the issuance of this permit, the Part B Permit Application and the subsequent amendments and responses listed in Table 1 are hereby approved:

Table 1 – LIST OF OPERATION PLANS

FACILITY	DOCUMENT	DATE
Bldg. 13	"Operation Plan Yard D-13 and Building 13"	Feb 1987
	"Hazardous Waste Management Plan, Vols. 1 and 2"	Feb 1987
	"Amendments, Operation Plan, Hazardous Waste Storage Facility, Building 13"	Aug 1990
	"Response to Deficiencies for Building 13"	Jun 1991
	"Response to Deficiencies for Building 13"	June 1992
Yard D-13	"Operation Plan Yard D-13 and Building 13"	Feb 1987
	"Hazardous Waste Management Plan, Vols. 1 and 2"	Feb 1987
	"Operation Plan, Hazardous Waste Storage Facility, Yard D-13"	Aug 1990
	"Operation Plan, Appendices, Hazardous Waste Storage Facility, Yard D-13"	Aug 1990
	"Response to Deficiencies for Yard D-13"	Jun 1991
IWTP 5	"Operation Plan, Industrial Wastewater Treatment Plant, Building 5"	Apr 1988
	"Amendments, Operation Plan, Industrial Wastewater Treatment Plant, Building 5"	Aug 1990
	"Response to Deficiencies Identified for Building 5"	Aug 1991
	"Response to Deficiencies Identified for Building 5"	Jul 1992
IWTP 24	"Operation Plan, MILCON Project P-704 Industrial Wastewater Treatment Facility"	Jun 1988
	"Response to Deficiencies Identified for Building 24 IWTP"	Jun 1992
	"....response to your Notice of Deficiency...Building 24 IWTP (Paint and Finishing Hanger)"	Feb 1992

IWTP 25	"Operation Plan, Industrial Wastewater Treatment Plant, Building 25"	Aug 1990
	"Operation Plan, Appendices, Industrial Wastewater Treatment Plant Building 25"	Aug 1990
	"Response to Deficiencies Identified for Building 25 IWTP"	Jan 1992
	"...response to Notice of Deficiencies...Building 25 (Corrosion Control Facility)"	Feb 1992
	"...response to Notice of Deficiencies ...Building 25"	Jun 1992
IWTP 32	"Operation Plan for MILCON Project P-783, Industrial Wastewater Treatment Facility"	Jun 1988
	"Response to Deficiencies identified for Building 32 IWTP"	Jan 1992
	"...response to Notice of Deficiencies...Building 32 (Plating Facility)"	Feb 1992
	"...response to Notice of Deficiencies...Building 32"	Jun 1992
Structure #598	"Operation Plan, Hazardous Waste Storage Facility, Area 37, Structure #598"	Aug 1990
	"Operation Plan, Appendices, Hazardous Waste Storage Facility, Area 37, Structure #598"	Aug 1990
	"Response to Deficiencies Identified for Area 37, Structure No. 598"	Feb 1992

The following documents were also reviewed and their findings were applied in the review of this Permit application: "Oil/Hazardous Substance/Hazardous Waste Spill Contingency Plan," dated April 1990; "Corrective Action Plan," submitted August 1990; "Health Risk & Burden Analysis Project P-783, Plating Shop Facility, Vols. I & II," dated August 1989; "Biological Impact Assessment of Six Military Construction Projects at NAS Alameda ", dated August 1989; "Hazardous Waste Management Plan, Naval Air Station, Alameda", Vols. 1 & 2, February 1987; "Health Risk Assessment" dated October 1992.

This Part B Permit Application and any subsequent revisions thereto, subject to the permit modification requirements contained in title 22,

Cal. Code of Regs., Sections 66270.41 and 66270.42, are by this reference made part of this permit. Specific sections of this Part B Permit Application are referenced elsewhere in this permit.

2. The owner and/or operator shall operate and maintain the facility in accordance with the Part B Permit Application.
3. In the event of any conflict between this permit and the Part B Permit Application referenced herein, the most stringent provisions shall be controlling.
4. The Part B Permit Application and this permit shall be maintained at the facility and place of business at all times until closure is completed.

N. General Responsibilities of Operator

1. Compliance

The owner/or operator shall comply with all conditions of this permit. In accordance with title 22, Cal Code of Regs., Section 666270.30(a). The owner or operator shall comply with all laws, regulations, permits, zoning conditions, and all other requirements established by federal, state, and local agencies.

2. Transfer of the Permit

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to title 22, Cal. Code of Regs., Section 66270.40. The owner and/or operator shall notify DTSC's Region 2 Facility Permitting Branch Chief, in writing, of a proposed change in ownership of this facility no later than thirty (30) days prior to the proposed date of transfer. A copy of the notification, required under title 22, Cal. Code of Regs., Section 66264.12(c), informing the new owner or operator of the requirements of this permit and title 22, Cal Code of Regs., Division 4.5, Chapters 14 and 20, shall be submitted to DTSC.

3. Operation and Maintenance

- a. The facility shall be maintained at all times and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.
- b. All equipment, pipes, and lines used at the facility to handle, transfer, pump, or store hazardous wastes shall be

maintained in a manner that prevents the leaking and spilling of hazardous wastes.

- c. The owner and/or operator shall at all times properly operate and maintain all facilities and systems of treatment and control in accordance with title 22, Cal. Code of Regs., Section 66270.30(e).

4. Submittal of Requested Information

The owner and/or operator shall furnish to DTSC, within the time specified by DTSC in its request, any relevant information which DTSC may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The owner or operator shall also furnish to DTSC, upon request, copies of records required to be kept by this permit.

5. Hazardous Waste List

The owner and/or operator shall maintain a current list of hazardous wastes that are handled by the facility. The owner and/or operator shall, as necessary, update the hazardous waste list submitted in the approved Part B Permit Application, in accordance with the permit modification requirements contained in Title 22, Cal Code of Regs., Section 66270.42. Any additions to the list must be approved by DTSC, in accordance with the requirements of title 22, Cal. Code of Regs., Sections 66270.41 and/or 66270.42, prior to their inclusion.

6. Anticipated Noncompliance

The owner and/or operator shall give advance notice to DTSC of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements, in accordance with title 22, Cal. Code of Regs., Section 66270.30(1)(2).

7. Noncompliance

In the event of noncompliance with the permit, the owner and/or operator shall take all reasonable steps to minimize or correct releases to the environment, and shall carry out all measures as are reasonable to prevent and correct adverse impacts on human health or the environment. The owner or operator shall report to the California Office of Emergency Services (800) 852-7550 any circumstances that may endanger public health or the environment immediately upon becoming aware of the incident.

8. Incomplete and/or Incorrect Information

Where the owner and/or operator becomes aware that any relevant facts were not included, or incorrect information was submitted, in a permit application or in any report to DTSC, the owner and/or operator shall promptly correct the error or omission.

O. Signatory Requirement

1. The owner and/or operator shall comply with the signatory requirements in title 22, Cal. Code of Regs., Section 66270.11, for all applications, reports or information submitted to DTSC.
2. The owner/operator shall provide documentation of an agreement for operation of the facility between property owner and the facility owner, if different from the property owner, if requested by DTSC.

P. Waste Minimization Certification

The owner and/or operator shall certify annually, by March 1 for the previous year ending December 31, that:

1. The facility has a program in place to reduce the volume and toxicity of all hazardous and mixed wastes which are generated by the facility operations to the degree, determined by the owner and/or operator, to economically practicable.
2. The method of storage, treatment, or disposal is the only pragmatic method or combination of methods currently available to the facility which minimizes the present and future threat to human health and the environment.

The owner and/or operator shall make this certification, in accordance with title 22, Cal. Code of Regs., Section 66270.11. The owner and/or operator shall submit the certification to DTSC's Region 2 Facility Permitting Branch Chief and shall record and maintain on-site such certification in the facility Operating Record.

Q. Waste Minimization Conditions

1. The owner and/or operator shall comply with the Hazardous Waste Source Reduction and Management Review Act requirements that are specified in the H&SC Sections 25244.19, 25244.20 and 25244.21, and any subsequent applicable promulgations.
2. The owner and/or operator shall submit a copy of all reviews, plans, plan summaries, reports and report summaries required by Section II.Q.1 above, to the appropriate Department Regional Facility



Permitting Branch Chief on or before March 1, 1992, and by March 1, every four years thereafter.

DTSC's Regional Facility Permitting Branch Chief may require the facility to submit a more detailed status report explaining any deviation from, or changes to, the approved waste minimization plan.

R. Air Emission Standards for Equipment Leaks and Containers

1. The owner and/or operator shall comply with all applicable air emission standards under the omnibus provisions of title 22, Cal. Code of Regs., Section 66270.32 for equipment leaks.
2. No hazardous or mixture of wastes with an organics concentration of 500 parts per million by weight (ppmw) or greater shall be placed in containers with emission controls.
3. When the concentrations of the volatile organics in any individual container used to handle, treat, transfer, or store waste are over 500 ppmw, the owner and/or operator shall install, operate and maintain a cover on that container, and load pumpable waste into the container using a submerged fill pipe placed so that the outlet extends to within two fill pipe diameters of the bottom of the container while the container is being filled. Annual updates of the list of equipment subject to air emission standards shall be kept onsite.

III. SPECIAL CONDITIONS

A. Prohibition of Disposal

Hazardous wastes shall not be disposed of at the facility.

B. Permitted and Prohibited Waste

1. Permitted Wastes

Building 13

This permit authorizes the owner and/or operator to store the following wastes in containers at the facility, subject to the conditions of this permit, the requirements of title 22, Cal. Code of Regs., Division 4.5, Chapter 14, Article 9, and as follows:

**TABLE 2 - STORAGE IN BUILDING 13**

BAY NAME	MAXIMUM STORAGE VOLUME ALLOWED
ACIDS	3,960 gallons
OXIDIZER	3,960 gallons
CAUSTICS	3,960 gallons
ORM LIQUIDS	3,960 gallons
ORM-E LIQUIDS	3,960 gallons
FLAMMABLE LIQUIDS &	23,565 gallons
PCB STORAGE	4,840 gallons
NON-FLAMMABLE	62,040 gallons

Table 2 above, shall supersede the Maximum Waste Inventory listed on page A3-11 of "Amendments, Operation Plan, Hazardous Waste Storage Facility, Building 13"

Various sized containers from five (5) gallons to fifty-five (55) gallon drums may be used to store waste, but the aggregate volume of all containers in the bay shall not exceed the Maximum Storage Volume Allowed.

Fifty-five (55) gallon drums containing liquid waste shall not be stacked. Five gallon containers of liquid waste may be stacked two containers high or as high as the local ordinances may allow, whichever is more stringent.

Fifty-five (55) gallon drums containing solid waste may be stacked two drums high and all drums shall be on pallets.

A minimum aisle space of 3 (three) feet shall be maintained in all bays and all shall be visible.

Bulking of identical wastes type and composition may be performed in an appropriate bay in Building 13.

Bulking of the same generic wastes may be performed in an appropriate bay in Building 13. For example, "BRAND" transmission waste oil may be bulked with "BRAND Y" transmission waste oil.

Except for the bulking mentioned above, there shall be no treatment of wastes in Building 13.

Waste may be stored for up to one year from the date Building 13 received it. The Station shall have a procedure in place that will track the receipt date of each hazardous waste container.

See Table V-1, page V-2 in "AMENDMENTS OPERATION PLAN, HAZARDOUS WASTE STORAGE FACILITY BUILDING 13," published in August 1990 and "HAZARDOUS WASTE GENERATOR REQUIREMENTS," submitted August 1990 for details.

EPA WASTE CODES WHICH ARE ACCEPTABLE\* AT BUILDING 13

- A. The following waste codes (exhibiting a hazardous characteristic) are acceptable: D001, D002, D003, D006, D007, D008, D009, D004, D005, D011, D018, D035, D039, D040.
- B. The following waste codes (from non-specific sources) are acceptable: F001, F002, F003, F005, F039.
- D. The following waste codes (discard commercial chemical products, off-spec species, container residues, and spill residues, of the listed acutely hazardous wastes) are acceptable: P015, P030, P122.
- E. The following waste codes (discarded commercial chemical products, off-spec species, etc.) are acceptable: U159, U228, U075, U103, U188, U208, U210, U222, U226, U121, U002, U228, U075, U103, U188, U208, U210, U222, U226, U121, U002, U133, U151, U154, U204, U220, U239.

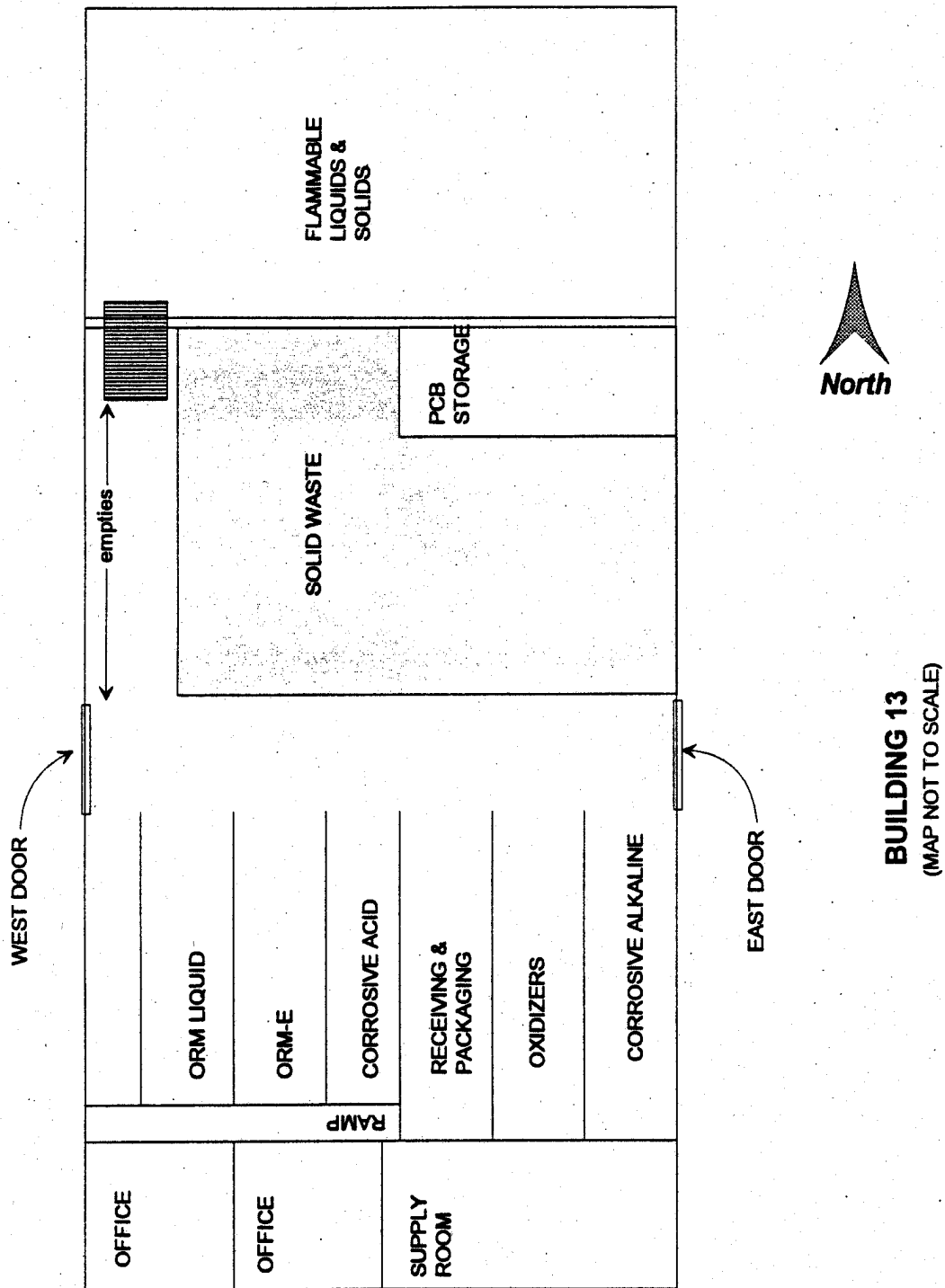
STATE WASTE CODES WHICH ARE ACCEPTABLE\* AT BUILDING 13

122, 131, 151, 181, 211, 213, 221, 223, 272, 281, 291, 331, 341, 352, 461, 512, 513, 611, 723, 741, 751, 792, 801, 121, 123, 134, 135, 141, 171, 212, 214, 224, 241, 261, 321, 343, 351, 491, 541, 561, 724, 725, 726, 731, 791.

See \*AMENDMENTS OPERATION PLAN, HAZARDOUS WASTE STORAGE FACILITY, BUILDING 13," August 1990, Table V-1 for details.

\* By acceptable it is meant that only these listed waste codes can be stored or treated in containers and/or tanks in accordance with Permit Condition III and the appropriate operation plan.

FIGURE 1 - BUILDING 13



Yard D-13

This permit authorizes the owner and/or operator to store the following wastes in containers at the facility, subject to the conditions of this permit, the requirements of title 22, Cal. Code of Regs., Division 4.5, Chapter 14, Article 9, and as follows:

**TABLE 3 - STORAGE BAYS IN YARD D-13**

STORAGE BAY NAME	MAXIMUM STORAGE VOLUME ALLOWED (gal)
1000 GALLON OIL & SOLVENT	14,300
FLAMMABLES & COMBUSTIBLES	8,000
ORM-E (large bay)	13,500
ORM-E (small bay)	8,000
BERYLLIUM	3,500
ACIDS	3,600
HALOGENATED SOLVENTS	660
ALKALIS	2,700
CYANIDES	800
CORROSIVES	4,500

Five (5) gallon drums, fifty-five gallon drums or 1000 gallon "bowzers" may be used to store waste, but the aggregate volume of all containers in the bay shall not exceed the Maximum Storage Volume Allowed.

Fifty-five (55) gallon drums containing liquid waste shall not be stacked. Five gallon containers of liquid waste may be stacked two containers high or as high as the local ordinances may allow, whichever is more stringent.

Fifty-five (55) gallon drums containing solid waste may be stacked two drums high and all drums shall be on pallets.

A minimum aisle space of 3 (three) feet shall be maintained in all bays and all labels shall be visible.

Bulking of identical wastes type and composition may be performed in an appropriate bay in Yard D-13.

Bulking of the same generic wastes may be performed in an appropriate bay in Yard D-13. For example, "BRAND X" transmission waste oil may be bulked with "BRAND Y" transmission oil.

Except for the bulking mentioned above, there shall be no treatment of waste in Yard D-13.

There shall be no explosives (as defined by the U.S. Department of Transportation) stored in Yard D-13.

Upon receiving wastes, Yard D-13 shall record the date of receipt for each container. Wastes that are waiting for analysis may be kept in the Truck Loading and Unloading Bay for no more than six (6) days. These wastes shall be clearly marked as "UNKNOWN, Lab Analysis Pending". Yard D-13 shall only store wastes in their designated bay.

Waste may be stored for up to one year from the date Building 13 received it. The Station shall have a procedure in place that will track the receipt date of each hazardous waste container.

The layout of the bays (cyanides, acids, corrosives, etc.) in Figure 2 of this Permit shall supersede the layout of the bays presented on page V-5 of "Operation Plan, Hazardous Waste Storage Facility, Yard D-13", August 1990.

See Table V-1 page V-2 in "OPERATION PLAN, HAZARDOUS WASTE STORAGE FACILITY YARD D-13", published in August 1990 and "HAZARDOUS GENERATOR REQUIREMENTS" submitted August 1990 for details.

EPA WASTE CODES WHICH ARE ACCEPTABLE AT YARD D-13

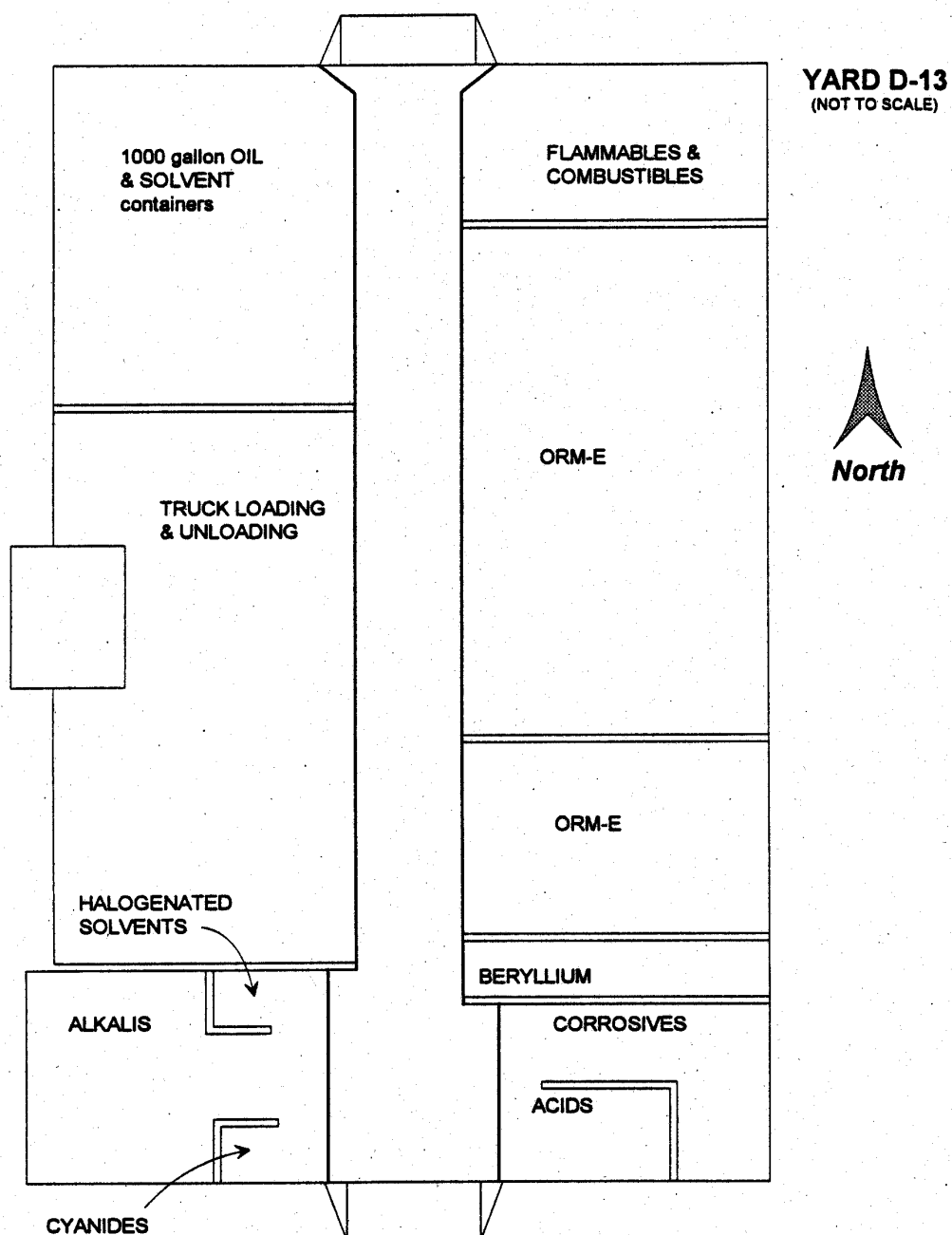
- A. The following waste codes (exhibiting a hazardous characteristic) are acceptable: D001, D002, D006, D007, D008, D009, D011.
- B. The following waste codes (from non-specific sources) are acceptable: F001, F002, F003, F005, F007.
- C. The following waste codes (discard commercial chemical products, off-spec species, container residues, and spill residues, of the listed acutely hazardous wastes) are acceptable: P030, P015.
- D. The following waste codes (discarded commercial chemical products, off-spec species, etc.) are acceptable: U013.

STATE WASTE CODES WHICH ARE ACCEPTABLE AT YARD D-13

111, 112, 121, 122, 131, 132, 134, 141, 151, 171, 172, 181, 211, 212, 213, 221, 223, 271, 272, 277, 277, 281, 291, 331, 342, 343, 352, 461, 513, 711, 791.

See \*OPERATION PLAN, HAZARDOUS WASTE STORAGE FACILITY, YARD D-13", August 1990, Table V-1 for details.

FIGURE 2 YARD D-13





Industrial Wastewater Treatment Plant 5

Storage and Treatment in Tanks

The owner and/or operator shall store and treat hazardous waste in tanks in accordance with the requirements of title 22, Cal Code of Regs., Division 4.5, Chapter 14, Article 10.

The owner and/or operator shall store and treat hazardous wastes only in the tanks designed below. The maximum treatment capacity for the chrome reduction unit and clarifier is 50 gallons per minute each. The owner or operator shall not store hazardous wastes exceeding the maximum inventory as specified below:

**TABLE 4 - TREATMENT AND STORAGE TANKS IN IWTP 5**

TANK NAME	TANK #	MAXIMUM VOLUME (gal)	MATERIAL OF CONSTRUCTION	TYPE OF WASTE
EQUILIZATION	T502	20,000	steel	chrome wastewater
HOLDING TANK	-	4,200	steel	chrome wastewater
OIL STORAGE	T503	1,000	steel	waste oil
OIL/WATER SEPARATOR	T504	1,000	carbon steel	wastewater
DEWATERING SCREEN AND HOPPER FOR PAINT SKINS	---	screen: 5.5 ft <sup>2</sup> hopper: 380	screen: stainless steel hopper: steel	paint skins
WASTE CHROME SUMP	T507	240	concrete	wastewater
STRIPPING WASTE SUMP	T501	240	concrete	wastewater
WASTEWATER FLOW	T508	22,800	steel	wastewater
CHROME* REDUCTION	T509	1,000	steel	wastewater (pH 2.5)
CHROME* REDUCTION	T510	1,000	steel	wastewater (pH 2.5)
RAPID MIX*	T511	940	steel	wastewater (pH 11.5)
RAPID MIX*	T511	940	steel	wastewater (pH 11.5)

RAPID MIX*	T512	940	steel	wastewater (pH 11.5)
FLOCCULATOR*	T513	2,250	steel	wastewater (pH 11.5)
CLARIFIER	T514	9,900	steel	wastewater (pH 11.5)
NEUTRALIZATION		425	stainless steel	wastewater (pH 11.5)
SLEDGE HOPPER	T516	4,600	steel	sludge

There shall be no treatment or storage of cyanide bearing wastes in IWTP5. Sludge from IWTP 5 may be transferred to IWTP 32 for dewatering. Anodizing wastewaters from Building 167 may be treated in IWTP 5.

\* Tanks with an asterisk are incorporated in one system.

#### EPA WASTE CODES WHICH ARE ACCEPTABLE AT IWTP5

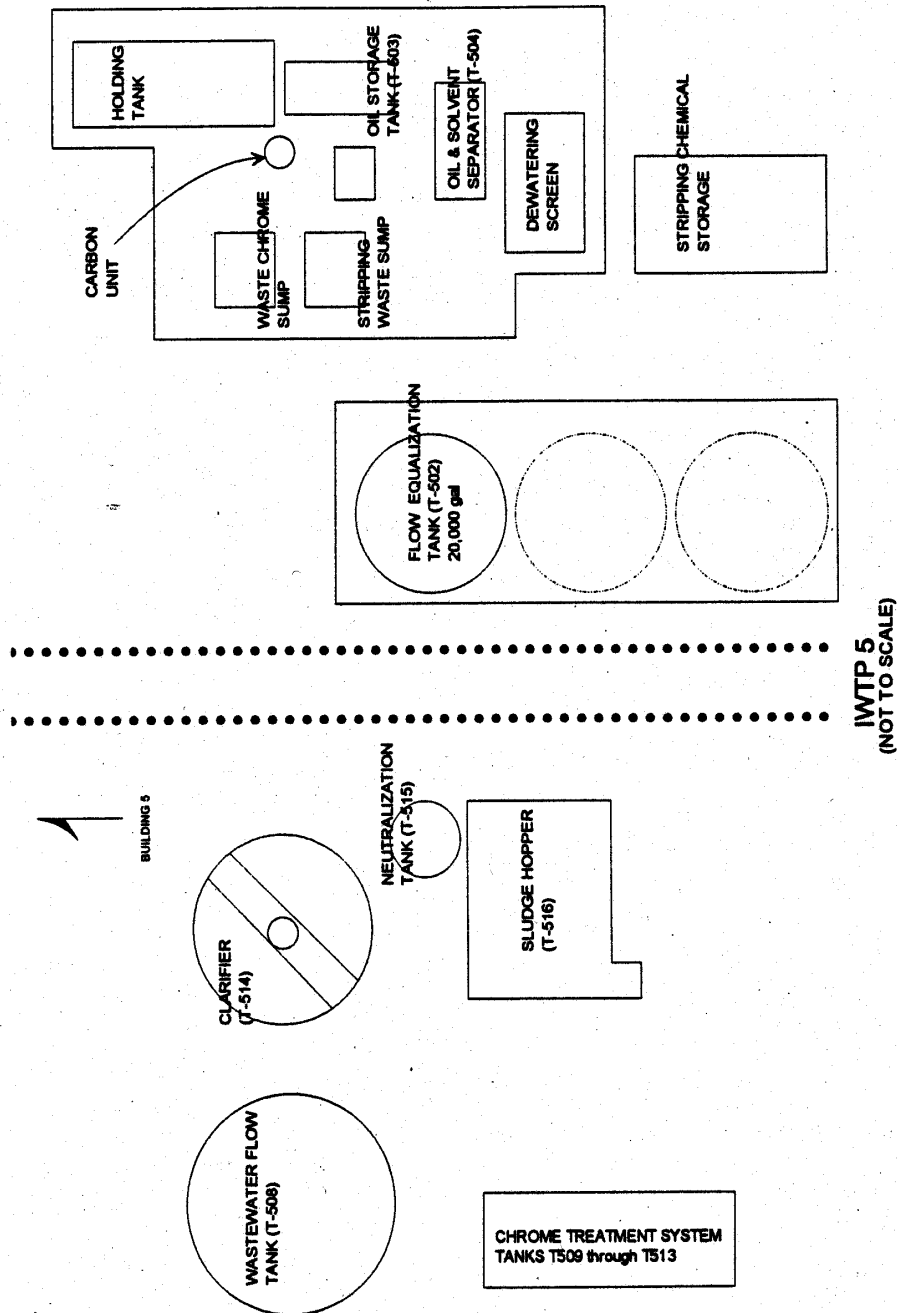
- A. The following waste codes (exhibiting a hazardous characteristic) are acceptable: D006, D007, D008.
- B. The following waste codes (from non-specific sources) are acceptable: F006, F008, F019.

#### STATE WASTE CODES WHICH ARE ACCEPTABLE AT IWTP5

131, 132, 222, 241, 561

See \*OPERATION PLAN INDUSTRIAL WASTE TREATMENT PLANT, BUILDING 5, April 1988, Table 1, page 8 for details.

FIGURE 3 - IWTP 5



## Industrial Wastewater Treatment Plant 24

### Storage and Treatment in Tanks

The owner and/or operator shall store and treat hazardous waste in tanks in accordance with the requirements of title 22, Cal. Code of Regs., Division 4.5, Chapter 14, Article 10.

The owner and/or operator shall store and treat hazardous wastes only in the tanks designated in Table 5. The owner or operator shall not store or treat hazardous wastes at IWTP 24 that exceeds the maximum inventory as specified in table 5. The maximum treatment capacity for the Heavy Metal Reduction (HMR) system is 30 gallons per minute. The owner and/or operator shall treat hazardous wastes only in the chambers and the filter press designated below:

**TABLE 5 – TREATMENT AND STORAGE IN IWTP #24**

<b>TANKS and HMR SYSTEM (Chambers)</b>	<b>MAXIMUM CAPACITY (gal)</b>	<b>MATERIAL OF CONSTRUCTION</b>	<b>TYPES OF WASTE</b>
TWO FLOW EUALIZATION TANKS	5,000 each	Hardened steel	Industrial wastewater with Cr
CHROME* REDUCTION	483	steel	Wastewater w/Cr
FINAL pH* ADJUSTMENT	412	steel	Wastewater w/Cr (pH 8/5)
FLOCCULATION*	1120	steel	Wastewater w/ppt.
CLARIFICATION*	1455	steel	Wastewater w/ppt.
SLUDGE AGEING #1	868	steel	Metal bearing sludge

SLUDGE AGEING #2	868	steel	Metal bearing sludge
EFFLUENT SUMP	515	steel	Water to be polished and discharged into sewer
FILTER PRESS	6,500 gallons of sludge/day	Steel and man-made filters	Sludge is dewatered

\* Tanks with an asterisk are incorporated in the HMR system.

A maximum of 20 cubic yards of dewatered sludge may be stored in a bin at IWTP 24.  
This bin and its waste shall have generator-only status.

EPA WASTE CODES WHICH ARE ACCEPTABLE AT IWTP 24

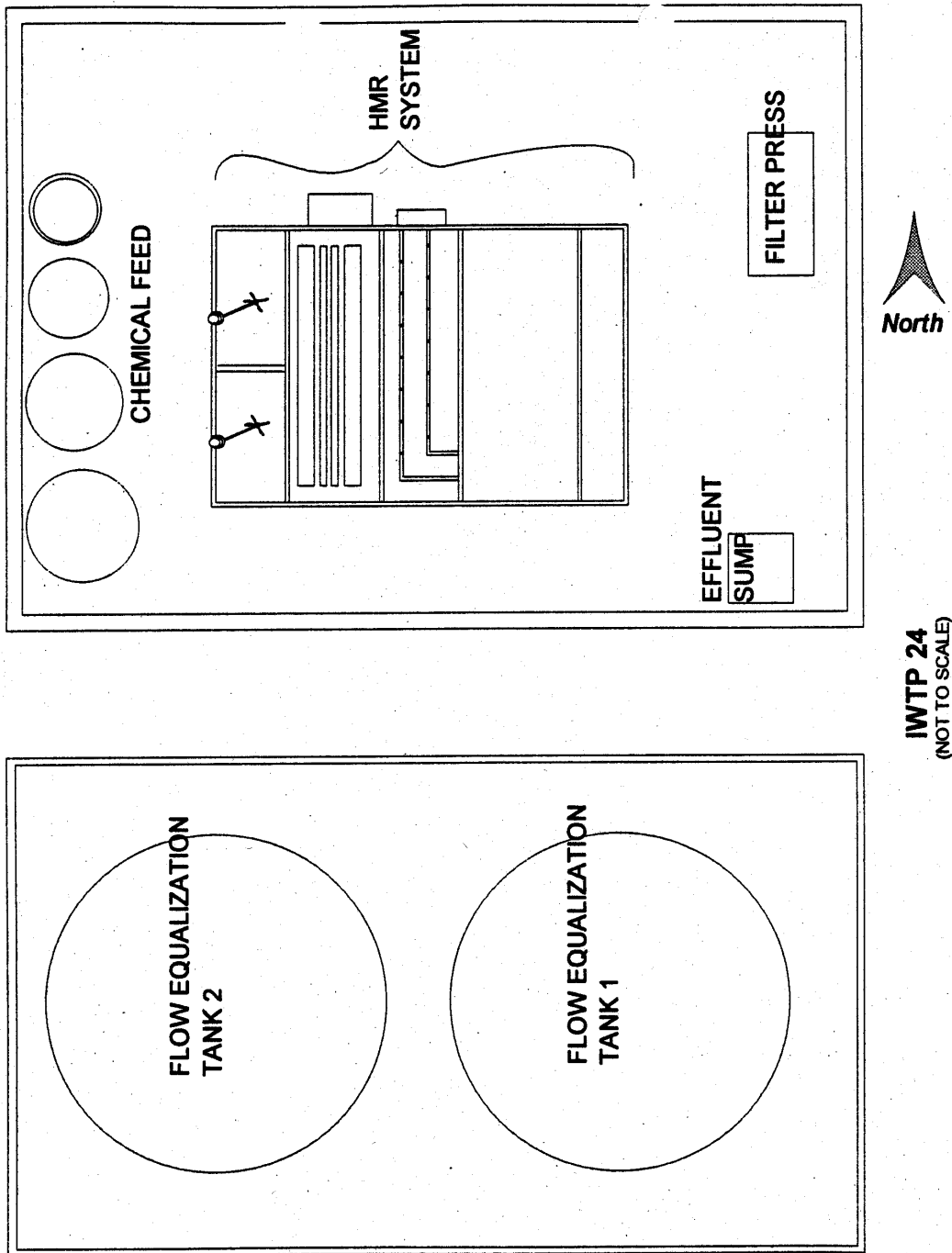
- A. The following waste codes are acceptable: D002, D007.
- B. The following waste codes (from non-specific sources) are acceptable:  
F019.

STATE WASTE CODES WHICH ARE ACCEPTABLE AT IWTP 24

122, 132, 421.

See "OPERATION PLAN FOR MILCON PROJECT P-704, INDUSTRIAL WASTE  
TREATMENT FACILITY", June 1988, page 5-2 for details.

FIGURE 4 - IWTP 24



Industrial Wastewater Treatment Plant 25

Storage and Treatment in Tanks

The owner and/or operator shall store and treat hazardous waste in tanks in accordance with the requirements of title 22, Cal Code of Regs., Division 4.5, Chapter 14, Article 10.

The owner and/or operator shall store and treat hazardous wastes only in the tanks designated below. The maximum treatment capacity for the chrome reduction unit and clarifier is 50 gallons per minute each. The owner or operator shall not store hazardous wastes exceeding the maximum inventory as specified in below:

**TABLE 6 - STORAGE AND TREATMENT TANKS IN IWTP 25**

<b>TANKS</b>	<b>MAXIMUM VOLUME (gal)</b>	<b>MATERIAL OF CONSTRUCTION</b>	<b>TYPE OF WASTE/ COMMENTS</b>
PAINT SCREEN WITH HOPPER	380	Screen: stainless steel Hopper: steel	Paint skins from wastewater
EQUALIZATION TANK #1	32,000	A283 carbon steel	Paint stripping wastew/Cr+6
CHROME TREATMENT UNITS	6,900 for the whole unit	A36 carbon steel	Paint stripping wastew/Cr+6 is reduced and precipitated
CLARIFIER #1	3,000	A36 carbon steel	Cr+6 free waste w/ phenol separates from sludge
NEUTRALIZATION UNITS	790 for tank and sump	Mild steel	Cr free waste w/ phenol is neutralized
EQUALIZATION TANK #2	41,000	A283C Carbon Steel	Cr free waste w/ phenol is stored
TWO BIOREACTOR UNITS	12, 540 each	fiberglass	Phenol waste is destroyed by bacteria

SLUDGE THICKNER	6,000	Mild steel	Cr laden sludge
TWOCALGON CARBON UNITS	2,750 each	Carbon steel	Cr free waste w/ phenol
CLARIFIER #2	500	A36 carbon steel	Phenol treated water w/ sludge
TTO REDUCTION UNITS	500 each (2x carbon units and sump)	Carbon steel	Phenol treated water w/o sludge
SAMPLING WELL	400	Carbon steel	Phenol treated water w/o sludge
FILTER PRESS	20 ft <sup>3</sup> per cycle at 1.25" thick cakes	Amine Epoxy coated steel frame	Phenol contaminated metal hydroxide sludge

The paint bin (for the Paint Screen) shall be managed as a generator-only container.

A maximum of 20 cubic yards of dewatered sludge may be stored in a bin at IWTP 25. This bin and its waste shall have generator-only status.

See Tables VI-2 and VI-3, pages VI-5 and VI-7 in "OPERATION PLAN, INDUSTRIAL WASTEWATER TREATMENT PLANT, BUILDING 25", published in August 1990, for details.

#### EPA WASTE CODES WHICH ARE ACCEPTABLE AT IWTP 25

- A. The following waste codes (exhibiting a hazardous characteristic) are acceptable: D001, D007.
- B. The following waste codes (from non-specific sources) are acceptable: F002.
- C. The following waste codes (discarded commercial chemical products, off-spec species, container residues, of the listed acutely hazardous wastes) are acceptable: U080, U188.

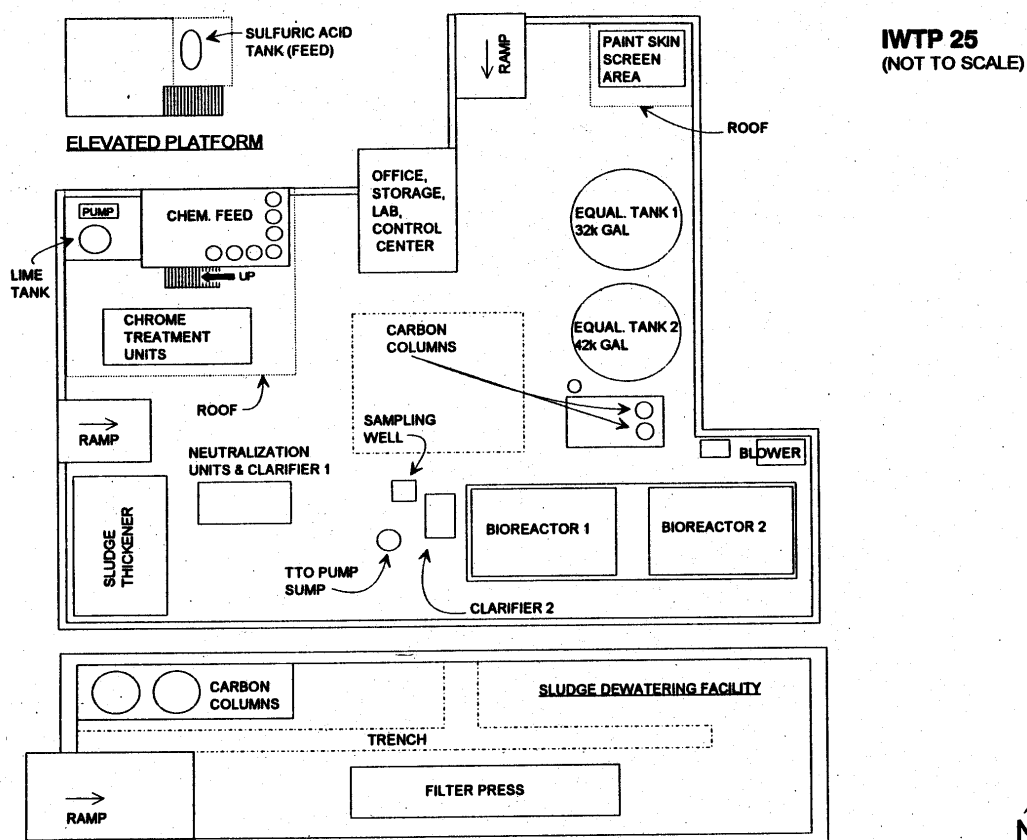
#### STATE WASTE CODES WHICH ARE ACCEPTABLE AT IWTP25

121, 132, 211, 212, 222, 342, 441, 461



See "OPERATION PLAN, INDUSTRIAL WASTEWATER TREATMENT PLANT,  
BUILDING 25", August 1990, Table V-1 for details.

FIGURE 5 – IWTP 25



Industrial Wastewater Treatment Plant 32

Storage and Treatment in Tanks

The owner and/or operator shall store and treat hazardous waste in tanks in accordance with the requirement of title 22, Cal. Code of Regs., Division 4.5, Chapter 14, Article 10.

The owner and/or operator shall store and treat hazardous wastes only in the tanks designated below. The maximum treatment capacity for the clarifier is 50 gallons per minute. The owner or operator shall not store hazardous wastes exceeding the maximum inventory as specified below:

**TABLE 7 - TREATMENT AND STORAGE TANKS FOR IWTP 32**

<b>TANKS</b>	<b>MAXIMUM CAPACITY  (gal)</b>	<b>MATERIAL OF CONSTRUCTION</b>	<b>TYPE OF WASTES</b>
Ni & Cd Waste Tank	800	steel	Ni & Cd wastes from selective plating
Ni Waste Tank	800	steel	Ni wastes from selective plating
Cd Waste Tank	800	steel	Cd wastes from selective plating
Two Cd Filters	14 each	316 stainless steel	Cd precipitates
Ni Filter	14	316 stainless steel	Ni precipitates
Acid/Alkali Waste Collection Tank	800	304 stainless steel	Acid or alkali wastewaters
Two Acid/Alkali Tanks	6,000 each	fiberglass	Acid or alkali wastewaters are neutralized
Acid/Alkali Final Neutralizing Tank	3,000	304 stainless steel	Polishing neutralization step
Chrome Waste Sump	800	304 stainless steel	Hexavalent chrome waters

Two Chrome Waste Tanks	4,000 each	fiberglass	Chrome wastes are reduced
Cadmium Waste Collection Tank	800	304 stainless steel	Cyanide and cadmium waters
Two Cadmium Waste Tanks	4,000 each	fiberglass	Cadmium and cyanide wastes are treated
Cyanide Waste Sump	900	304 stainless steel	Cyanide waste waters are accumulated
Two Cyanide Waste Tanks	4,000 each	fiberglass	Cyanide waters are treated
Mixed Metals Collection Tank	800	304 stainless steel	Cu, Ni, Al waste waters are accumulated
Two Mixed Metals Tanks	6,000 each	fiberglass	Cu, Ni, Al waste waters are accumulated
Holding Tank (final neutralization)	7,500	fiberglass	Effluent from all treatment processes
Neutralizing Tank (final neutralization)	1,500	304 stainless steel	Effluent is neutralized prior to discharge to sewer
Clarifier	200 gallons/minute	Steel lined with vulcanized rubber	Effluent is separated from sludge
Filter Press	10 ft <sup>3</sup> per cycle at 1.25" thick cakes	Amine epoxy coated steel frame	Metal hydroxide sludge

A maximum of 20 cubic yards of dewatered sludge may be stored in a bin at IWTP 32. This bin and its waste shall have generator-only status.

See Part VI, pages 6-1 in "OPERATION PLAN FOR MILCON PROJECT P-783, INDUSTRIAL WASTE TREATMENT FACILITY", published in June 1988 for details.

EPA WASTE CODES WHICH ARE ACCEPTABLE AT IWTP 32

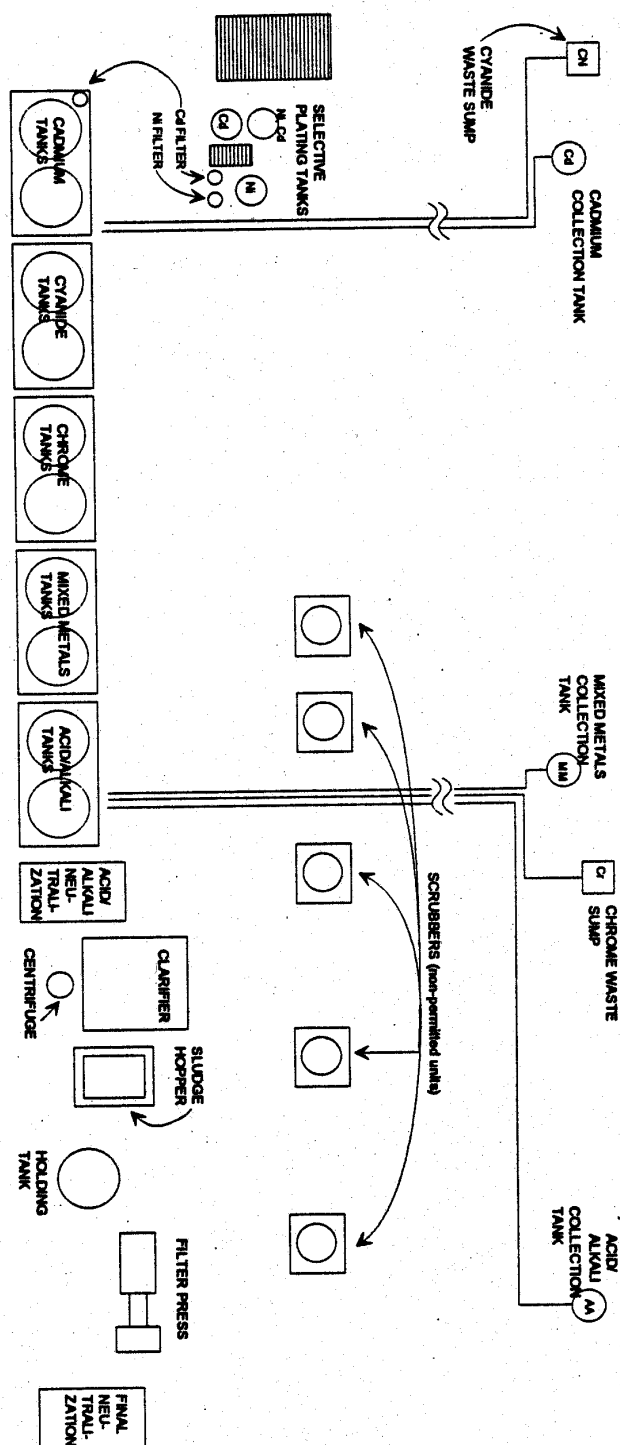
- A. The following waste codes (exhibiting a hazardous characteristic) are acceptable: D006, D007, D008, D011.
- B. The following waste codes (from non-specific sources) are acceptable: F006, F007, F008, F009, F019.

STATE WASTE CODES WHICH ARE ACCEPTABLE AT IWTP 32

131, 132, 421, 441, 711, 722, 723, 724, 726.

See "OPERATION PLAN FOR MILCON PROJECT P-783 INDUSTRIAL WASTE TREATMENT FACILITY", June 1988, Table V-1 for details.

**IWTP 32**  
**(NOT TO SCALE)**



Structure 598, Area 373

Storage in Tanks.

The owner and/or operator shall store hazardous waste in tanks in accordance with the requirements of title 22, Cal. Code of Regs., Division 4.5, Chapter 14, Article 10.

The owner and/or operator shall store hazardous waste only in the tanks designated below:

Three above ground steel tanks. Each tank shall have a maximum capacity of 25,000 gallons. Two tanks shall store fuel wastes. The third tank shall store oily wastes.

See Table V-1, page V-2 in "OPERATION PLAN, HAZARDOUS WASTE STORAGE FACILITY AREA 37, STRUCTURE #598", published in August 1990 for details.

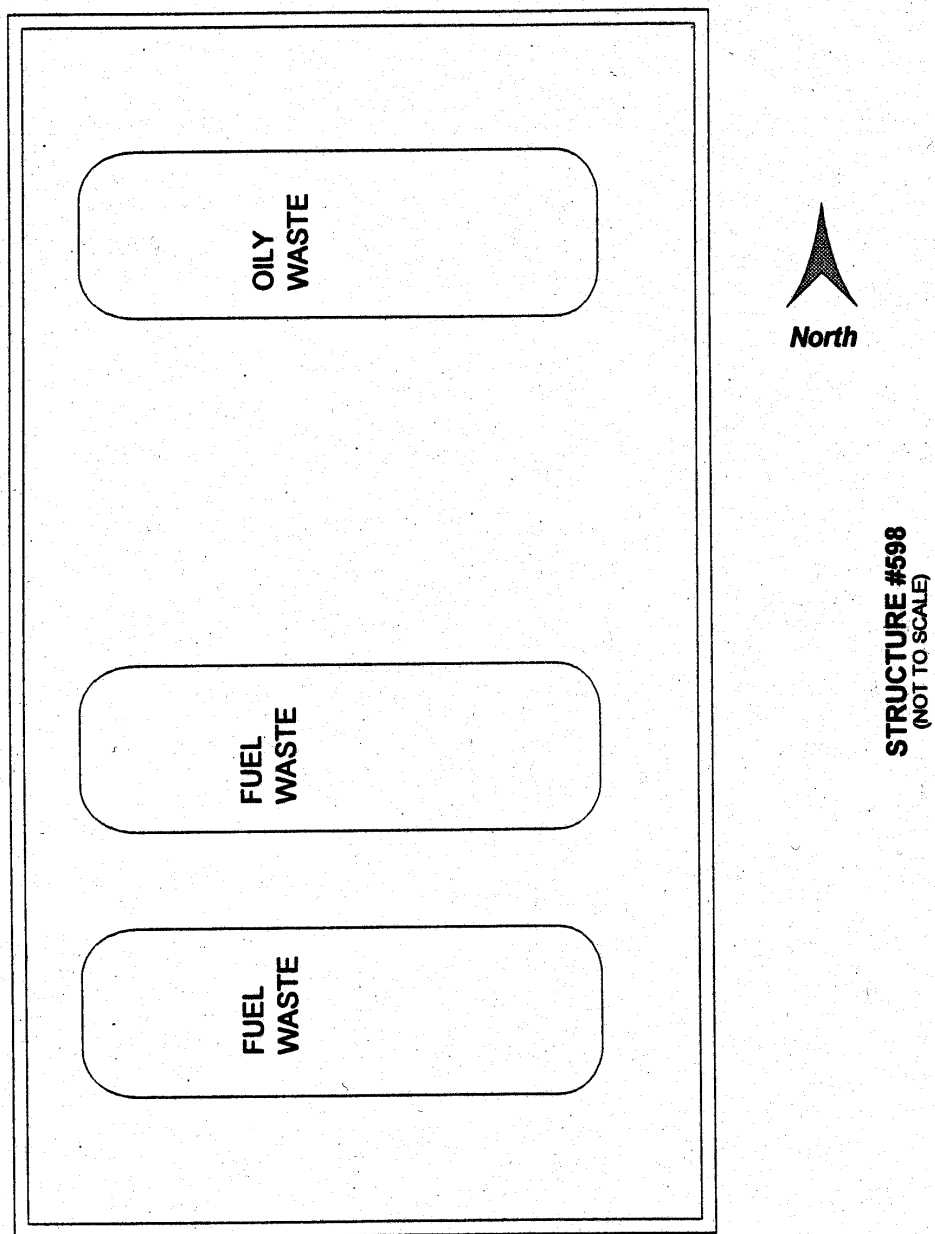
EPA WASTE CODES WHICH ARE ACCEPTABLE AT STRUCTURE #598

A. The following waste code is acceptable: D001.

STATE WASTE CODES WHICH ARE ACCEPTABLE AT STRUCTURE #598

134, 221

FIGURE 7 - Structure #598





### C. OTHER CONDITIONS

#### Engineer's Certification

The owner or operator shall submit the following items to DTSC as required in title 22, Cal. Cod of Regs., Sections 66264.191(f){tanks} and/or 66264.175(c){containment}.

**TABLE 8 - LIST OF ADDITIONAL SUBMITTALS**

ITEM	FACILITY	DATE DUE
Engineer's Written Certification of Containment and Tanks	IWTP 5	Ninety (90) days after the issuance of this H. W. Permit
Engineer's Written Certification of Containment and Tanks	IWTP 24	Ninety (90) days after the issuance of this H. W. Permit
Engineer's Written Certification of Containment and Tanks, including the selective plating waste tanks	IWTP 32	Ninety (90) days after the issuance of this H. W. Permit
Engineer's Written Certification of Containment and Tanks	Structure #598	Ninety (90) days after the issuance of this H. W. Permit
Engineer's Written Certification of Containment and Tanks	Building 13	Ninety (90) days after the issuance of this H. W. Permit
An "As Installed" Schematic diagram of the roof over Yard D-13	Yard D-13	Ninety (90) days after the issuance of this H. W. Permit
Engineer's Written Certification of Containment and Tanks	Yard D-13	Ninety (90) days after the issuance of this H. W. Permit

#### Emergency Response

The Station shall have a HAZMAT team or equivalent, that can respond to hazardous waste spills and releases. The personnel of the HAZMAT team or its equivalent shall have the minimum training required in 29 CFR 1910.120 and title 8, Cal. Code of Regs. Section 5192(e). All personnel engaging in hazardous waste emergency response in the Station shall have the minimum required training as stated in 29 CFR 1910.120 and title 8, Cal. Code of Regs., Section 5192(e).

The Station shall develop an Evacuation Plan for on-base personnel, on-base residents and local (or off-base) residents. The Station shall place a copy of

the Evacuation Plan at the Alameda Free Library on 2264 a Clara Avenue, Alameda, California or another Department approved repository by November 15, 1993.

#### Training Records

The Station shall complete a training matrix form (see Appendix for every personnel that handles hazardous wastes in the seven facilities on-site. Maintaining the training matrix form will be in addition the training documentation that is required in Title 22, Cal. Code of Regs., Section 66264.16 (Personnel Training).

The Station shall keep and maintain a copy of training matrix forms at the Alameda Free Library on 2264 Santa Clara Avenue, Alameda, California or another Department approved repository by November 15, 1993. The forms in the repository shall be updated every year by November 15. The names of Station personnel may be omitted from the forms maintained in the repository.

#### Report of Violations

The Station shall put a copy of all future (if any) Report of Violations (ROVs) in the Alameda Free Library on 2264 Santa Clara Avenue, Alameda, California or another Department approved repository within fourteen days (14) days of receiving the ROVs from DTSC.

#### Closure Plans

After decontamination, a *representative sampling* of the, containments, and if needed, the soils shall be taken in order to certify that these items have been adequately decontaminated. A detailed sampling plan (complete with sampling points, rationale for the sampling points, depths of sampling if needed, sampling methods, etc.) shall be submitted to DTSC for approval prior to the final closure of all the hazardous waste facilities in the Station.

### **IV. COMPLIANCE SCHEDULE**

#### **A. Reporting**

The owner and/or operator shall comply with the compliance schedule requirements of title 22, Cal. Code of Regs., Section 66270.30(l)(5).

## **V. CORRECTIVE ACTION SCHEDULE OF COMPLIANCE**

### **A. SUMMARY OF RFA FINDINGS/RESULTS**

A RCRA Facility Assessment (RFA) was conducted and a report summarizing the findings was prepared by DTSC in December of 1991. As a result of the RFA, it was evident that there have documented releases of hazardous waste to the soil and groundwater. The RFA identifies 142 Solid Waste Management Units (SWMUs). Section V.E and Appendix 2 describes the SWMUs and AOCs that need investigation and/or further research now. Sections V.F through V.Q also describe the corrective action procedures that will go into affect if additional SWMUs, or contamination at existing SWMUs is identified.

### **B. DEFINITIONS**

For purposes of this Corrective Action Schedule of Compliance the following definitions shall apply:

“Facility” means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal, or recycling hazardous waste management units, or combination of these units [title 22, Cal. Code of Regs., Section 66260.10].

“Release” means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing into the environment [HS&C, Section 25320].

“Solid waste management unit” or SWMU means any unit at a hazardous waste facility from which hazardous constituents might migrate, irrespective of whether the unit was intended for the management of wastes, including but not limited to: containers, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection wells [title 22, Cal. Code of Regs., Section 66260.10].

“Hazardous waste” means a hazardous waste as defined in title 22, Cal. Code of Regs., Section 66261.3. "Hazardous waste" includes extremely hazardous waste, acutely hazardous waste, RCRA hazardous waste, non-RCRA hazardous, and special waste [title 22, Cal. Code of Regs., Section 66260.10].

"Hazardous constituent" means any constituent identified in Appendix VIII of title 22, Cal. Code of Regs., Division 4.5 Chapter 11 or any other element, chemical compound, or mixture of compounds which is a component of a hazardous waste or leachate and which has a physical or chemical property that causes the waste or leachate to be identified as a hazardous waste [title 22, Cal. Code of Regs., Section 66260.10].

All references herein to Solid Waste Management Unit (SWMU) Numbers are found in RCRA Facility Assessment At Naval Air Station, Alameda, California Environmental Protection Agency, December 1991.

C. STANDARD CONDITION

1. Section 3004(u) of RCRA, as amended by Hazardous and Solid Waste Amendments (HSWA), and 40 CFR 264.101, and 25200.10 HS&C require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste including hazardous constituents from many SWMU at the facility, regardless of when the waste was placed in the unit.
2. Failure to submit the information required in this Corrective Action Schedule of Compliance, or falsification of any submitted information, is grounds for termination of this Permit (title 22, Cal. Code of Regs., Section 66270.42). The owner and/or operator shall ensure that all plans, reports, notifications, and other submissions to DTSC required in this Corrective Action Schedule of Compliance are signed and certified in accordance with title 22, Cal. Code of Regs., Section 66270.11. Two (2) copies of these plans, reports, notifications or other submissions shall be submitted to DTSC and sent by certified mail or hand delivered to:

Facility Permitting Branch Chief  
California Environmental Protection Agency  
Department of Toxic Substances Control  
Region 2  
700 Heinz Avenue, Building F, Suite 300  
Berkeley, California
3. All plans and schedules required by the conditions of this Corrective Action Schedule of Compliance are, upon approval of

DTSC, incorporated into this Schedule of Compliance by reference and become an enforceable part of this Permit. Any noncompliance with such approved plans and schedules shall be termed noncompliance with this Permit. Extensions of the due dates for submittals may be granted by DTSC in accordance with the permit modification processes under title 22, Cal. Cod of Regs., Section 66270.42.

4. If DTSC determines that further actions beyond those provided in is Corrective Action Schedule of Compliance, or changes to that which is stated herein, are warranted, DTSC shall modify the Schedule of Compliance either according to procedures in Section V.Q of this Permit, or according to the permit modification processes under title 22, Cal. Code of Regs., Section 66270.42.
5. All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Corrective Action Schedule of Compliance shall be maintained at the facility during the term of this Permit, including any reissued Permits.

D. REPORTING REQUIREMENTS

1. The owner and/or operator shall submit to DTSC signed quarterly progress reports of all activities conducted pursuant to the provisions of this Corrective Action Schedule of Compliance, beginning no later than ninety (90) calendar days after the owner and/operator is fires required to begin implementation of any requirement herein. These reports shall contain:
  - a. A description of the work completed;
  - b. Summaries of all findings, including summaries of laboratory data;
  - c. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems; and
  - d. Projected work for the next reporting period.
2. Copies of other reports (e.g., inspection reports), drilling logs and laboratory data shall be made available to DTSC upon request.

3. As specified under Permit Condition V.C.4, DTSC may require the owner and/or operator to conduct new or more extensive assessments, investigations, or studies, as needed, based on information provided in these progress reports or other supporting information.

E. CORRECTIVE ACTION REQUIRED FOR EXISTING SWMUs

- 1) SWMU numbers GII-4, GII-5, GII-6, GII-7, GII-11, GII-22, GII-23, UST-2, UST-5, UST-7, UST-8, UST-10, UST-11, UST-13, UST-16, AND UST-19 have released or have the potential to release wastes to the soil and groundwater. The facility shall perform a RCRA Facility Investigation on these SWMUs.

SWMU number IR-1 through IR-23 have released or have the potential to release wastes to the soil and groundwater. These SWMUs are currently being investigated by the facility with the DTSC's Site Mitigation Branch (SMB). If needed, corrective action requirements for these SWMUs shall be made after SMB have finished its work.

The following are Areas of Concern (AOC) that the facility shall investigate to determine if wastes have been released to the environment: 1) Tanks 15-1, 2, 3; 2) Tank 411; 3) Tanks 261-1, 2, 3; 4) Tank 372; 5) Tank 398-1, 2; 6) Tank 473; 7) Tanks AV 1 and 2; 8) Tank FS (fire training station); and 9) Building 397. The facility shall perform a RCRA Facility Investigation on these AOCs.

- 2) The owner and/or operator shall submit to DTSC a RCRA Facility Investigation (RFI) Workplan no later than 60 days after receiving a request from DTSC. The Workplan and subsequent findings shall conform with the requirement stated in Sections V.H through V.Q below.

The RFI Workplan may include documents that support any claims that the Station have regarding the status of the SWMUs or AOCs. For example, If the Station believes that an underground tank should be investigated, the Workplan may include leak tests, confirmation sampling results or any other documents that justify the Station's claims.

DTSC is aware that the Station plans to remove several underground tanks. The RFI Workplan may propose alternative schedules to those stated in Sections V.H through V.Q for all underground tanks listed as an AOC or SWMU, provided that the schedules are amenable with the local regulatory agencies (i.e., Alameda County Environmental Health). The Station shall submit to DTSC local regulatory agency letters of

concurrence or equivalent, regarding the schedule within the RFI Workplan. DTSC shall review for approval any proposed alternative schedule, justifications and RFI Workplans.

F. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF  
NEWLY-IDENTIFIED SOLID WASTE MANAGEMENT UNIT(S)

1. The owner and/or operator shall notify DTSC in writing of any newly-identified SWMU(s) not specifically identified during the RFA and listed in Permit Condition V.A, no later than thirty (30) calendar days after discovery.
2. After such notification, DTSC may request, in writing, that the owner and/or operator prepare a Solid Waste Management Unit (SWMU) Assessment Plan and a proposed schedule of implementation and completion of the plan.
3. Within sixty (60) calendar days after receipt of DTSC's request for an assessment Plan, the owner and/or operator shall prepare a SWMU Assessment Plan for determining past and present operations at the unit, as well as any sampling and analysis of ground water, land surface and release of hazardous waste including hazardous constituents from such unit(s) has occurred, is likely to have occurred, or is likely to occur. The SWMU Assessment Plan must demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste including hazardous constituents from the newly discovered SWMU(s) to the environment.
4. After the owner and/or operator submits the SWMU Assessment Plan, DTSC shall either approve or disapprove the Plan in writing.

If DTSC disapproves the Plan, DTSC shall either (1) notify the owner and/or operator in writing of the Plan's deficiencies and specify a due date for submittal of a revised Plan, or (2) revise the Plan and notify the owner and/or operator of the revisions. This Department-revised Plan becomes the approved SEMU Assessment Plan. The owner and/or operator shall implement the Plan within thirty (30) calendar days of receiving written approval.

5. The owner and/or operator shall submit a SWMU Assessment Report to DTSC no later than thirty (30) calendar days from completion of the work specified in the approved SWMU Assessment Plan. The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. At a minimum, the Report shall provide the following information for each newly identified SWMU:
  - a. The location of the newly-identified SWMU in relation to other SWMUs;
  - b. The type and function of the unit;
  - c. The general dimensions, capacities, and structural description of the unit (supply any available drawings);
  - d. The period during which the unit was operated;
  - e. The specifics on all wastes that have been or are being managed at the SWMU, to the extent available; and
  - f. The results of any sampling and analysis required for the purpose of determining whether releases of hazardous wastes including hazardous constituents have occurred, are occurring, or are likely to occur from the unit.
6. Based on the results of this Report, DTSC shall determine the need or further investigations at specific unit(s) covered in the SWMU Assessment. If DTSC determines that such investigations are needed, DTSC may require the owner and/or operator to prepare a plan for such investigations. This plan will be reviewed for approval as part of the RFI Workplan under Permit Condition V.H.1.

G. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT SWMUs

The owner and/or operator shall notify DTSC, in writing, of any previously unreported release(s) of hazardous waste including hazardous constituents no later than thirty (30) calendar days after discovery. DTSC may require further investigation of the newly-identified release(s). A plan for such investigation will be reviewed for approval as part of the RFI Workplan under Permit Condition V.H.1.



H. RCRA FACILITY INVESTIGATION (RFI) WORKPLAN

1. On or before sixty (60) calendar days after a request by DTSC, the owner and/or operator shall submit a Workplan to DTSC to address those units and/or areas of concern, releases of hazardous waste including hazardous constituents, and media of concern which require further investigation.
  - a. The Workplan shall describe the objectives of the investigation and the overall technical and analytical approach to completing all actions necessary to characterize the nature, direction, rate, movement, and concentration of releases of hazardous waste including hazardous constituents from specific units or groups of units, and their actual or potential receptors. The Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the RFI.
  - b. In addition, the Workplan shall discuss sampling and data collection quality assurance and data management procedures, including formats for documenting and tracking data and other results of investigations, and health and safety procedures.
2. After the owner and/or operator submits the Workplan, DTSC will either approve or disapprove the Workplan in writing.

If DTSC disapproves the Workplan, DTSC shall either (1) notify the owner and/or operator in writing of the Workplan's deficiencies and specify a due date for submittal of a revised Plan, or (2) revise the Workplan and notify the owner and/or operator of the revisions. This modified Workplan becomes the approved RFI Workplan.

3. DTSC shall review for approval as part of the RFI Workplan any plans developed pursuant to Permit Condition V.F.6, addressing further investigations of newly-identified SWMUs, or Section V.G, addressing new releases from previously-identified units. DTSC shall modify the Schedule of Compliance either according to

procedures in Section V.Q of this Permit, or according to the permit modification procedures under title 22, Cal. Code of Regs., Section 66270.42, to incorporate these units and releases into the RFI Workplan.

I. RCRA FACILITY INVESTIGATION WORKPLAN IMPLEMENTATION

No later than (30) calendar days after the owner and/or operator has received written approval from DTSC for the RFI Workplan, the owner/and/or operator shall begin implementation of the RCRA Facility Investigation according to the schedules specified in the RFI Workplan. Pursuant to Permit Condition V.C.3 the RFI shall be conducted in accordance with the approved RFI Workplan.

J. RCRA FACILITY INVESTIGATION FINAL REPORT AND SUMMARY REPORT

1. Within ninety (90) calendar days after the completion of the RFI, the owner and/or operator shall submit an RFI Final Report and Summary Report. The RFI Report shall describe the procedures, methods, and results of all facility investigations of SWMUs and their releases, including information on the type and extent of contamination at the facility, sources and migration pathways, and actual or potential receptors. The RFI Final Report shall present all information gathered under the approved RFI Workplan. The Final Report must contain adequate information to support further corrective action decisions at the facility. The Summary Report shall describe more briefly the procedures, methods, and results of the RFI.
2. After the owner and/or operator submits the RFI Final Report and Summary Report, DTSC shall either approve or disapprove the Reports in writing. If DTSC approves the RFI Report and summary Report, the owner and/or operator shall mail the approved Summary Report to all individuals on the facility mailing list established pursuant to 40 CFR 124.10(c)(1)(viii), within thirty (30) calendar days of receipt of approval.

If DTSC determines the RFI Final Report and Summary Report do not fully detail DTSC may disapprove the RFI Final Report and Summary Report. If DTSC disapproves the Reports, DTSC shall notify the owner and/or operator in writing of the Reports' deficiencies and specify a due date for submittal of a revised Final

and Summary Report. The Summary Report, once approved, shall be mailed to all individuals on the facility mailing list.

K. INTERIM MEASURES

1. If, during the course of any activity initiated under this Corrective Action Schedule of Compliance, DTSC determines that a release or potential release of hazardous waste including hazardous constituents from a SWMU poses a threat to human health and the environment, DTSC may specify interim measures. DTSC shall determine the specific action(s) that must be taken to implement the interim measure, including potential permit modifications and the schedule for implementing the required measures. DTSC shall notify the owner and/or operator in writing of the requirement to perform such interim measures. DTSC shall modify the Corrective Action Schedule of Compliance either according to procedures in Section V.Q of this Permit, or according to the permit modification procedures under title 22, Cal. Code of Regs., Section 66270.42 to incorporate such interim measures into the permit.
2. The following factors may be considered by DTSC in determining the need for interim measures:
  - a. Time required to develop and implement a final remedy;
  - b. Actual and potential exposure of human and environmental receptors;
  - c. Actual and potential contamination of drinking water supplies and sensitive ecosystems;
  - d. The potential for further degradation of the medium absent interim measures;
  - e. Presence of hazardous waste in containers that may pose a threat of release;
  - f. Presence and concentration of hazardous waste including hazardous constituents in soils that have the potential to migrate to ground water or surface water;

- g. Weather conditions that may affect the current levels of contamination;
- h. Risks of fire, explosion, or accident; and
- i. Other situations that may pose threats to human health and the environment.

L. CORRECTIVE MEASURES STUDY PLAN

1. If DTSC has determined that contaminants at the facility pose a threat to human health and the environment given site-specific exposure conditions, DTSC may require a Corrective Measures Study (CMS) and shall notify the owner and/or operator in writing. This notice shall identify the hazardous constituent(s) which have exceeded action levels as well as those which have been determined to threaten human health and the environment given site-specific exposure conditions. The notification may also specify remedial alternatives to be evaluated by the owner and/or operator during the CMS.
2. The owner and/or operator shall submit a CMS Plan to DTSC within ninety (90) calendar days from notification of the requirement to conduct a CMS.
3. The CMS Plan shall provide the following information:
  - a. description of the general approach to investigating and evaluating potential remedies;
  - b. A definition of the overall objectives of the study;
  - c. The specific plans for evaluating remedies to ensure compliance with remedy standards.
  - d. The schedules for conducting the study; and
  - e. The proposed format for the presentation of information.
4. If DTSC determines the CMS Plan does not provide the necessary information, DTSC may disapprove the CMS Plan. If DTSC disapproves the CMS Plan, DTSC will either (1) notify the owner and/or operator in writing of the Plan's deficiencies and specify a

due date for submittal of a revised Plan, or (2) revise the Plan and notify the owner and/or operator of the revisions. This modified Plan becomes the approved CMS Plan.

M. CORRECTIVE MEASURES STUDY IMPLEMENTATION

No later than forty-five (45) calendar days after the owner and/or operator has received written approval from DTSC for the CMS Plan, the owner and/or operator shall begin to implement the Corrective Measures Study according to the schedules specified in the CMS Plan. Pursuant to Permit Condition V.C.3, the CMS shall be conducted in accordance with the approved Plan.

N. CORRECTIVE MEASURES STUDY FINAL REPORT

1. Within sixty (60) calendar days after the completion of the CMS, the owner and/or operator shall submit a CMS Final Report. The CMS Final Report shall summarize the results of the investigations for each remedy studied and of any bench-scale or pilot tests conducted. The CMS Report must include an evaluation of each remedial alternative. The CMS Report shall present all information gathered under the approved CMS Plan. The final report must contain adequate information to support the Department in the remedy selection decision making process, described under Section V.O of the Corrective. The final report must contain adequate information to support the Department in the remedy selection decision making process, described under Section V.O of the Corrective Action Schedule of Compliance.
2. If the Department determines that the CMS Final Report does not fully satisfy the information requirements specified under Permit Condition V.L.3., the Department may disapprove the CMS Final Report, the Department shall notify the owner and/or operator in writing of deficiencies in the Report and specify a due date for submittal of a revised Final Report.
3. As specified under Permit Condition V.C.4, based on preliminary results and the final CMS report, the Department may require the owner and/or operator to evaluate additional remedies or particular elements of one or more proposed remedies.

O. REMEDY SELECTION

1. Based on the results of the CMS and any further evaluations of additional remedies, the Department shall select a remedy from the remedial alternatives evaluated in the CMS that will (1) be protective of human health and the environment; (2) meet the concentration levels of hazardous constituents in each medium that the remedy must achieve to be protective of human health and the environment; (3) control the source(s) of release(s) so as to reduce or eliminate, to the maximum extent practicable, further releases that might pose a threat to human health and the environment; and (4) meet all applicable waste management requirements.
2. In selecting the remedy, the Department will consider the following evaluation factors, as appropriate:
  - a. Long-term reliability and effectiveness. Any potential remedy(s) may be assessed for the long-term reliability and effectiveness it affords, along with the degree of certainty that the remedy will prove successful. Factors that shall be considered in this evaluation include:
    - I. Magnitude of residual risks in terms of amounts and concentrations of waste remaining following implementation of a remedy, considering the persistence, toxicity, mobility and propensity to bioaccumulate of such hazardous wastes including hazardous constituents;
    - ii. The type and degree of long-term management required, including monitoring and operation and maintenance.
    - iii. Potential for exposure of human and environmental receptors to remaining wastes, considering the potential threat to human health and the environment associated with excavation, transportation, redisposal or containment;
    - iv. Long-term reliability of the engineering and institutional controls, including uncertainties associated with land disposal of untreated wastes and residuals; and

- v. Potential need for replacement of the remedy.
- b. Reduction of toxicity, mobility, and volume. A potential remedy(s) may be assessed as to the degree to which it employs treatment that reduces toxicity, mobility or volume of hazardous wastes including hazardous constituents. Factors that shall be considered in such assessments include:
  - i. The treatment processes that remedy(s) employs and materials it would treat;
  - ii. The amount of hazardous wastes including hazardous constituents that would be destroyed or treated;
  - iii. The degree to which the treatment is irreversible; and
  - iv. The residuals that will remain following treatment, considering the persistence, toxicity, mobility and propensity to bioaccumulate of such hazardous wastes including hazardous constituents.
- c. Short-term effectiveness. The short-term effectiveness of a potential remedy(s) may be assessed considering the following:
  - i. Magnitude of reduction of existing risks:
  - ii. Short-term risks that might be posed to the community, workers, or the environment during implementation of such a remedy, including potential threats to human health and the environment associated with excavation, transportation, and redisposal or containment; and
  - iii. Time until full protection is achieved.
- d. Implementability. The ease or difficulty of implementing a potential remedy(s) may be assessed by considering the following types of factors:

- I. Degree of difficulty associated with constructing the technology;
  - ii. Expected operational reliability of technologies;
  - iii. Need to coordinate with and obtain necessary approvals and permits from other agencies;
  - iv. Availability of necessary equipment and specialists; and
  - v. Available capacity and location of needed treatment, storage and disposal services.
- e. Cost. The types of costs that may be assessed include the following:
- I. Capital costs;
  - ii. Operation and maintenance costs;
  - iii. Net present value of capital and operation and maintenance costs; and
  - iv. Potential future remedial action costs.

P. PERMIT MODIFICATION FOR REMEDY

Based on information the owner and/or operator submits in the RFI Final and Summary Reports, the CMS Final Report, and other information, the Department will select a remedy and initiate a major permit modification the this Permit, pursuant title 22, Cal Code of Regs., Section 66270.42.

The modification shall specify the selected remedy and include, at a minimum, the following:

- 1. Description of all technical features of the remedy that are necessary for Achieving the remedies, including length of time for which compliance must be demonstrated at specified points of compliance;



2. All concentration levels of hazardous constituents in each medium that the remedy must achieve to be protective of human health and the environment;
3. All requirements for achieving compliance with these concentration levels;
4. All requirements for complying with the standards for management of wastes;
5. Requirements for removal, decontamination, closure, or post-closure of units, equipment, devices or structures that will be used to implement the remedy;
6. A schedule for initiating and completing all major technical features and milestones of the remedy; and
7. Requirements for submission of reports and other information.

Q. MODIFICATION OF THE CORRECTIVE ACTION SCHEDULE OF COMPLIANCE

1. If at any time the Department determines that modification of the Corrective Action Schedule of Compliance is necessary, it may initiate a modification to the Schedule of Compliance according to the procedures of this Section. If the Department initiates a modification, the Department will:
  - a. Notify the owner and/or operator in writing of the proposed modification and the date by which comments on the proposed modification must be received; and
  - b. Publish a notice of the proposed modification in a locally distributed newspaper, mail a notice to all persons on the facility mailing list maintained according to 40 CFR 124.10(c)(1)(viii), and place a notice in the facility's information repository (i.e., a central source of all pertinent documents concerning the remedial action) if one is required.
    - i. If the Department receives no written comment on the proposed modification, the modification shall

become effective five (5) calendar days after the close to the comment period.

- ii. If DTSC receives written comment on the proposed modification, DTSC shall make a final determination concerning the modification after the end of the comment period.
- c. Notify the owner and/or operator in writing of the final decision.
  - i. If no written comment was received, DTSC shall notify individuals on the facility mailing list in writing that the modification has become effective and shall place a copy of the modified Corrective Action Schedule of Compliance in the information repository, if a repository is required for the facility.
  - ii. If written comment was received, DTSC will provide notice of the final modification decision in a locally distributed newspaper and place a copy of the modified Corrective Action Schedule of Compliance in the information repository, if a repository is required for the facility.
- 2. Modifications that are initiated and finalized by DTSC according to this procedure shall not be subject to administrative appeal.
- 3. Modifications to the Corrective Action Schedule of Compliance do not constitute a re-issuance of the Permit.

#### **FACILITY SUBMISSION SUMMARY**

Below is a summary of the planned reporting requirements pursuant to this Corrective Action Schedule of Compliance:

<u>Facility Submission Requirements</u>	<u>Due Date</u>
RFI Workplan for SWMUs and AOCs that investigation as listed in Section V.E	sixty (60) calendar days after the need effective date of this Permit
Notification of newly-identified SWMUs	thirty (30) calendar days after discovery

Progress reports on all activities	quarterly, no later than ninety (90) calendar days after the owner and/or operator are required to begin implementation
SWMU Assessment Plan for newly-identified SWMUs	sixty (60) calendar days after receipt of request from Cal-EPA
Revised SWMU Assessment Plan	as determined
SWMU Assessment Report	thirty (30) calendar days after the completion of implementation of SWMU Assessment Plan
RFI Work Plan for newly-identified SWMU(s)	sixty (60) calendar days after the receipt of request from Cal-EPA
Revised RFI Workplan	as determined
RFI Report and Summary Report	ninety (90) calendar days after completion of RFI
Revised RFI Report and Summary Report	as determined
Interim Measures Plan	as determined
CMS Plan	ninety (90) calendar days after notification of requirement to perform CMS
Revised CMS Plan	as determined
CMS Report	sixty (60) calendar days after completion of CMS
Revised CMS Report	as specified in the notice of deficiency

## APPENDIX 1 - Map of Station



## **APPENDIX 2**

### **List of Solid Waste Management Units (SWMUs) and Areas of Concern (AOC) That Needs to be Addressed in the RFI**

~~NAS ALAMEDA—RCRA FACILITY ASSESSMENT~~

SWMU# GII-5

GAP 7 (NAS), Bldg. 420, NAS weapons

Description: This unit is located by Building 420.

Date of Start Up: Unknown.

Date of Closure: This unit is currently active. There are no plans for closing it.

Type of Waste: Solvents and thinners.

Waste Management: The GAP manager calls PWC and submits the profile sheet of the waste. PWC inspects the wastes. PWC will then arrange for a licensed contractor to pick up the waste. If the waste is getting to the 90 day limit for generators, PWC will arrange to transfer the waste into Building 13. Building 13 has interim status to store wastes for more than 90 days.

History of Releases: None known.

Results of VSI: This unit was not visited. Building 420 is a restricted area. No information is available to the inspector. The NAS Alameda Environmental Coordinator has no clearance to the building or its activities.

Conclusions: None. However, all of the GAPs in the facility are small areas where wastes are stored for a short time until it is hauled away for disposal. There is no reason to believe that this unit would be vastly different from the others. It is recommended that a MEDIUM priority for an RFI be considered for the GAP. The recommendation can be re-evaluated upon acquiring new information.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

SWMU# GII-6

GAP 8 (NAS), Building 166, COMNAVAIRPAC MATREP

Description: This unit is located outside the northwestern corner of Building 166. The unit is about 30' x 30' on a cement ground.

Date of start Up: GAPs were formally initiated in 1987. However, the shops and processes have been generating waste even before 1987. Hence the actual start up time for this unit is unknown.

Date of Closure: This unit is currently active. There are no plans for closing it.

Type of waste: Paint thinner and paint wastes, waste oil, solvents and hydraulic fluid.

Waste Management: The GAP manager calls PWC and submits the profile sheet of the waste. PWC inspects the wastes. PWC will then arrange for a licensed contractor to pick up the waste. If the waste is getting to the 90 day limit for generators, PWC will arrange to transfer the waste into Building 13. Building 13 has interim status to store wastes for more than 90 days.

History of Releases: No records of releases are available.

Results of VSI: Spills have certainly occurred, judging by the stained cement ground. The housekeeping and the organization needs improving.

Conclusions: There is a medium potential for releases into the soil and groundwater because there were spills to the ground as evidence of the stains. The ground is not impermeable because cracks are visible and it is not designed to be a secondary container.

There is low potential for releases into the surface waters because the unit is about 500 feet away from the Bay and the quantity of the waste in the unit is not enough to spillover to the surface water.

There is a low potential for releases into the air because the drums are closed and the size of the unit is small.

There is a low potential for surface gas releases into the air because this unit is not a landfill.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

SWMU# GII-7

GAP 9 (NAS), Bldg. 528, Construction Brigade unit (CBU) 416

Description: This unit is located east of Building 26 and south of Building 528. The unit is about 20' x 10' on sandy soil ground. Stains are visible on the soil.

Date of Start Up: Unknown.

Date of Closure: This unit is currently active. There are no plans for closing it.

Type of Waste: Waste hydrocarbons, spent lead-acid electrolyte.

Waste Management: This GAP generates little waste. About once a year, the GAP manager calls PWC to pickup the waste. PWC checks the profile and arranges for a contractor to dispose of it or store it in Building 13.

History of Releases: None known.

Results of VSI: The soils around the unit are stained, indicating there have been spills. The amount spilled is unknown. This unit is not adequate to accumulate hazardous wastes or store products.

Conclusions: There is a high potential for releases into the soil and groundwater because the unit does not have a secondary containment, it is outdoors and stains are visible on the soil in and around the unit.

There is a low potential for releases into the surface soils since the unit is in a flat area and it is not in a flood zone.

There is a low potential for releases into the air because the drums are closed.  
There is a low potential for surface gas releases into the air because this unit is not a landfill.



~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

SWMU# GII-II

GAP 15 and GAP 29 (NAS), Bldg. 67, NAS SELF HELP

Description: GAP 15 is located northeast of Building 67. This GAP was about 10' x 10'. The unit was made inactive, in and about January of 1991. GAP 29 is near the building by the fence. The GAP is about 20'x 12'. The concrete was stained.

Date of start Up: Unknown.

Date of Closure: GAP 15 closed in January 1991. GAP 29 is still operating. Waste that used to go to GAP 15 was transferred to GAP 29.

Type of Waste: Waste paint material, solvents, thinner, rags, waste oil. These wastes are generated from painting and maintenance activities of Shore Intermediate Maintenance Activity (SIMA).

Waste Management: The GAP manager calls PWC and submits the profile sheet for the waste. PWC inspects the wastes. PWC will then arrange for a licensed contractor to pick up the waste. If the waste is getting to the 90 day limit for generators, PWC will arrange to transfer the waste into Building 13. Building 13 has interim status to store wastes for more than 90 days.

History of Releases: None known.

Results of VSI: GAP 15 no longer exists. It used to stand on concrete ground at an area that is currently being use as the recycling (glass, aluminum cans, etc.) facility of NAS Alameda. The unit slopes to a depression on the ground. It appears to be a sump. Any spill in the unit has a good chance to drain into the sump.

The concrete underneath GAP 29 is noticeably stained. Whether the spills were contained immediately or the spills migrated through cracks in the concrete is unknown.

Conclusions: For GAP 15, there is a medium potential for releases into the soil and groundwater because any spills in the unit would have drained into the sump (soil). Although there are no stains leading to the sump, it is likely that all runoff in the area accumulated in the sump.

For GAP 29, there is a medium potential for releases into the soil and groundwater because the stains are visible in the concrete. And since the start date for the GAP is

unknown, it needs to be determined if the concrete prevented the spills from contaminating the soils and groundwater.

There was/is a low potential for releases into the surface waters because the quantity of the waste is not enough to migrate to the surface water.

There was/is a low potential for releases into the air because the drums are closed.

There is a low potential for surface gas releases into the air because this unit is not a landfill.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

SWMU# GII-22

GAP 26, Area 342, NAS Fuels Div

Description: Tank. Not much is known about this tank. Area 342 is in the southern part of the station.

Date of Start Up: Unknown.

Date of Closure: Unknown.

Type of Waste: Waste oil.

Waste Management: Unknown. Presumably the waste was pumped into a tanker and hauled away.

History of Releases: None known.

Results of VSI: The area is fenced. The underground tank lies somewhere between two large aboveground tanks.

Conclusions: Since nothing is known about this SWMU, a medium priority for an RFI is recommended.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

SWMU# GII-23

GAP 27 (NAS), Area 374, NAS Fuels Div.

Description: The exact location of this GAP was not found.

Date of Start Up: Unknown.

Date of Closure: Unknown.

Type of Waste: JP-S jet fuel waste.

Waste Management: Unknown.

History of Releases: Unknown.

Results of VSI: The area was fenced.

Conclusions: Since there are too many unknowns with this GAP, it is recommended that a medium priority for RFI is considered until additional information is acquired.

NOTE: PHOTOGRAPHS OF AREA 374 CAN BE SEEN IN THE USTs SECTION.

~~NAS ALAMEDA—RCRA FACILITY ASSESSMENT~~

SWMU# UST-2

Abandoned underground tanks #6-1, 2, 3 (PWC)

Description: All these tanks are 1,000 gallon steel tanks. It is unknown if they have corrosion protection or if they are lined.

It is not known if Tank 6-1 is single walled. Tank 6-2,3 are single walled.

Date of Start Up: Unknown.

Date of Closure: All three tanks are scheduled to be closed.

Type of Waste: Tank 6-1 stored solvent (unknown specifics) and about 70 gallons are left. Tank 6-2 also stored solvent and about 30 gallons are left in the tank. Tank 6-3 stored waste oils and about 1,000 gallons are left in the tank. However, some documents show that Tank 6-3 also stored solvent.

Waste Management: Solvents were product. Waste oils were presumable pumped out by a tanker and disposed off-site.

History of Releases: None known.

Results of VSI: This area was not visited.

Conclusions: Tank 6-3 is a SWMU if it stored waste oil. Since it is not known if the tanks leaked during their active years, a recommendation of a MEDIUM priority is made.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

SWMU# UST-5

Abandoned underground tanks, 13-1,2,3 (NAS)

Description: These tanks are located at the west side of Building 13, by Fifth Street. All three tanks are 2,400 gallon steel underground tanks. It is not known if the tanks are single walled, lined or if they have corrosion protection.

Date of Start Up: Unknown for all tanks.

Date of Closure: All tanks are scheduled to be closed.

Type of Waste: These tanks stored an unknown waste. Today, each of the tanks contains residual product, approx. 10 gallons each.

Waste Management: Not known.

History of Releases: None known.

Results of VSI: These tanks are underground.

Conclusions: Since these tanks stored hazardous waste, they are considered a SWMU. It is recommended that an RFI of a MEDIUM priority is established. Unless some sampling is performed, there is no way of determining whether the tanks leaked or not.

NOTE: SEE HW PERMITS SECTION FOR MORE INFORMATION.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

Underground storage tank #15-1, 2, 3 (NAS)

Description: All three tanks are 2,000 gallon steel/iron underground tanks. It is unknown if the tanks are single walled. The type of interior lining and type of corrosion protection are unknown. These tanks are located on the east side of Building 15.

Tank 15-1 is an active tank that stores diesel (product). The primary leak detection is a combination of precision testing and inventory reconciliation.

Tanks 15-2,3 are abandoned and filled with sand.

Date of Start Up: Unknown.

Date of Closure: Unknown. NAS has scheduled Tanks 15-2, 3 to be closed.

Type of Waste: Diesel product for Tank 15-1. Unknown for tank 15-2, 3 (most likely fuel).

Waste Management: This unit stores diesel fuel for use of motor vehicles.

History of Releases: None that is known.

Results of VSI: These tanks are underground so there is not much to see. The tanks are adjacent to Fifth Street.

Conclusions: Tank 15-1 is not a SWMU. It cannot be determined if Tanks 15-2 and 3 are SWMUs or if these tanks leaked. These tanks are only about 25' from the bay and any leakage has a high potential of contaminating the bay. Therefore, it is recommended that this unit is considered as an AOC.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

SWMU# UST-7

Area 37, above and underground tanks, GAP

Description: Area 37 is a fenced, outdoor tank storage area about 5 acres in size. Some tanks are located outside the fenced area. This unit is paved with asphalt. The unit is made of 20 underground tanks, three above ground tanks that need to be permitted and three temporary above ground Baker tanks.

Tank nos. 1, 3, 4, 13, 14, 15 and 16 are single walled, 25,000 gallon abandoned underground steel tanks. Tank nos. 5, 6, 7, 8, 21, 22, 23, 24 are active 25,000 gallon underground steel tanks. Tank nos. 2, 9, 10, 11 and 12 are 25,000 gallon underground steel tanks which are empty, not abandoned, but are scheduled for closure.

Structure #598 is a secondary containment that houses three 25,000 gallon above ground steel tanks. #598 is not in operation. NAS Alameda has requested #598 to be a permitted hazardous waste storage facility. The permit application is being reviewed at the time of this report.

The three Baker tanks each have a 6,500 gallon capacity. The tanks are made of polyethylene and they sit on vulcanized rubber secondary containments.

Area 37 also has a GAP by its western fence.

Date of Start Up: All underground tanks were installed in 1941. The Baker tanks have been in operation since 1989. #598 is not operating since the permit is pending. GAP start up is unknown.

Date of Closure: A closure plan for tank nos. 1, 3, 4, 13, 14, 15 and 16 have been submitted to the DTSC. All other inactive underground tanks will be closed at the time of the closure implementation. The active underground tanks will remain in operation.

The Baker tanks will be dismantled once #598 is permitted. There are no plans to close the GAP.

Type of Waste: Wastes types are listed in Table UST-2 (pg. 14 of this section). Bilge water is made of combustible liquid wastes that can be recycled as Fuel oil Reclaimed and Oily Wastewater. Fuel oil Reclaimed includes JP-5, diesel and heavy oils. Oily Wastewater has the same constituents as the waste combustible liquids but with more water, usually the result of tank cleaning.



The GAP stores contaminated rags, spilled solvents and fuel from AREA 37 activity.

Waste Management: The waste tanks are pumped out by a contractor before the 90 day limit expires. The wastes are either recycled or disposed.

History of Releases: None known.

Results of VSI: Area 37 is all paved in asphalt. The GAP can use some self-contained pallets, similar to NADEP GAPs. Stains are visible on the asphalt. The vulcanized rubber containment appears to retain liquids.

Conclusions: There is a medium potential for releases into the soil and groundwater because the underground tanks in the unit are fifty years old and all are single walled with no secondary containment. Protection against corrosion is unknown with a number of the tanks. Record keeping in past are not available, hence any leaks would not have been detected. A MEDIUM priority RFI is recommended for Area 37.

There is low potential for releases into the surface waters because the above ground tanks are contained and most other tanks are underground.

There is a low potential for releases into the air because the tanks are enclosed.

There is a low potential for surface gas releases into the air because this unit is not a landfill.

~~NAS ALAMEDA — RCRA FACILITY ASSESSMENT~~

SWMU# UST-8

Abandoned underground tanks, #117 (NAS)

Description: This tank is located south of Building 117. It is a 1,000 gallon steel tank. It is not known if it is single walled, lined or if it has corrosion protection.

Date of Start Up: Unknown.

Date of Closure: This tank is scheduled to be closed.

Type of Waste: The tank contained diesel waste (diesel + water).

Waste Management: Unknown.

History of Releases: None known.

Results of VSI: A photograph was taken.

Conclusions: Since this tank stored hazardous waste, it is a SWMU. There is not enough information that insures that the tank did not leak during its active years. Hence, an RFI of MEDIUM priority is given.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Abandoned underground tank #411 (PWC)

Description: This is a 10,000 gallon single walled steel tank. It is unknown if it has corrosion protection or if it is lined. The leak detection system is a visual check.

Date of Start Up: Unknown.

Date of Closure: This tank is scheduled for closure.

Type of Waste: The tank stored various solvents (product).

Waste Management: The tank did not store wastes.

History of Releases: None known.

Results of VSI: This tank is underground and lies north of the building.

Conclusions: This tank is not a SWMU.

This tank is an AOC because of the lack of information regarding the corrosion protection and the uncertainty regarding the effectiveness of the leak detection system.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Abandoned underground tanks #261-1, 2, 3 (NADEP)

Description: Tanks 261-1, 2 each has a 500 gallon capacity. These underground steel tanks are single walled and unlined. It is not known if these tanks have corrosion protection. Both these tanks lie inside Building 261.

Tank 261-3 is a 4,500 gallon underground steel tank. It is unlined and it is not known if it has corrosion protection. This tank lies outside the south wall of Building 261.

All three tanks were used to store solvents but all are currently empty.

Date of Start Up: All three tanks were installed in 1943.

Date of Closure: These tanks are scheduled to be closed. The Navy internal request to close was initiated on November 1990. Tanks 261-1,2 were emptied on 11/20/89. Tank 261-3 was emptied on 12/21/89.

Type of Waste: Tanks 261-1 and 2 stored kerosene while tank 261-3 stored PD-6-80

Waste Management: Tanks were used to store solvent product.

History of Releases: None known.

Results of VSI: Tanks were underground. Nothing to see.

Conclusions: There are no known releases into the soil and groundwater. However, these tanks should be considered as an AOC. The tanks are more than forty-five years old and it is not known if they had corrosion protection. The tanks have not been pressure tested.

There is low potential for releases into the surface waters because the tanks are underground.

There is a low potential for releases into the air because the tanks are underground.

There is a low potential for surface gas releases into the air because these tanks are not a landfill.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Abandoned underground tank #372 (NADEP)

Description: This tank is a 6,000 gallon steel underground tank located west of Building 372. The tank is single walled and unlined. It is not known if the tank has corrosion protection.

There is no leak detection system.

Date of start Up: This tank was installed in 1953.

Date of Closure: This tank is scheduled for closure. It was emptied on 11/20/89.

Type of Waste: This tank used to store jet fuel for jet engine testing. The tank is currently empty.

Waste Management: This tank stored product.

History of Releases: None known.

Results of VSI: The tank is abandoned.

Conclusions: There are no known releases into the soil and groundwater. However, this tank should be considered as an AOC because there is no means of determining if the tank leaked or not. The tank is about thirty-eight years old.

There is low potential for releases into the surface waters because the tank is underground.

There is a low potential for releases into the air because the tank is underground.

There is a low potential for surface gas releases into the air because the tank is not a landfill.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

SWMU# UST-10

Abandoned underground tank #374P-I (NAS)

Description: This is a 4,400 concrete tank. It is unknown if it is single walled (most likely), lined or if it had corrosion protection.

Date of Start U2: Unknown.

Date of Closure: This tank is scheduled for closure.

Type of Waste: An unknown quantity of fuel and water mixture is in the tank.

Waste Management: The wastes are pumped into tankers and disposed.

History of Releases: None known.

Results of VSI: This tank cannot be seen because it is underground.

Conclusions: This is a SWMU. An RFI of MEDIUM priority is recommended because the installation date is unknown, the tank material is concrete, and there is no leak detection system for this tank. Therefore, there is a medium potential release to the soil and groundwater. In addition, the tank is within fifty feet of the Oakland Estuary, indicating a medium potential for surface water releases.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~  
SWMU# UST-11

Abandoned underground tank #393 (NAS)

Description: This is a 500 gallon steel tank. It is unknown if it is single walled (most likely), lined, or if it has corrosion protection. It is not known if it has a leak detection system.

Date of Start Up: Unknown.

Date of Closure: This tank is scheduled for closure.

Type of Waste: About 120 gallons of waste paint and oil are in the tank.

Waste Management: The waste was pumped into a tanker and disposed.

History of Releases: None known.

Results of VSI: This tank is just south of Avenue G.

Conclusions: This unit is a SWMU and an RFI of MEDIUM priority is recommended because there are too many unknown features regarding the tank. A leak may have occurred during the tank's active life and it would have not been detected. The tank can have a medium potential for release into the soil and groundwater.

There is a low potential for surface water releases because the tanks is underground and more than 100 feet from the bay.

There is a low potential for air releases because the tank is underground.

There is a low potential for surface air releases because the tank is not a landfill.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Active tanks #398-1, 2 (NADEP)

Description: 398-1 and 398-2 are both 10,000 gallon stainless steel underground tanks. 398-1 stores JP-S (jet fuel) and 398-2 stores JP-TS, both are used to test jet engines in Building 398. Both tanks are single walled. The corrosion protection and type of lining are unknown for both tanks. Both tanks are currently empty and inactive. These tanks are located northeast of Building 398.

Date of Start Up: These tanks were installed in 1969.

Date of Closure: These tank are not scheduled to be closed.

Type of Waste: Tank 398-1 contained JP-S but is currently empty. Tank 398-2 contained JP-TS but is currently empty.

Waste Management: Tanks contained product, not waste. Product was used as fuel for the jet engines tested in Building 398.

History of Releases: Soil contamination was found, presumably due to spillage. An Engineering Service Request for soil testing and remediation plan was issued.

Results of VSI: These tanks were exposed during the VSI. The leak was being fixed.

Conclusions: The pipes of the tanks have been determined to have a leak. It is recommended that the tanks are considered an AOC.



~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~  
SWMU# UST-13

Abandoned underground tanks #420-1, 2 (NAS)

Description: The capacity of each tank is unknown, but it must be less than 1,000 gallons. Both tanks are made of steel. It is not known if the tanks are single walled, lined or if they have corrosion protection or a leak detection system.

Date of Start UQ: Unknown.

Date of Closure: These tanks are scheduled to be closed.

Type of Waste: Tank 420-1 stored diesel (product). Tank 420-2 stored diesel waste.

Waste Management: The wastes were pumped into a tanker for disposal.

History of Releases: None known.

Results of VSI: The area around Building 420 is restricted, even to the station's Environmental Coordinator. Hence, the tanks were not visited.

Conclusions: Tank 420-2 is a SWMU. An RFI of MEDIUM priority is recommended for this tank. There is a medium potential for groundwater releases because the tank could have leaked without being detected during its active years.

~~NAS ALAMEDA-RCRA FACILITY ASSESSMENT~~

SWMU# UST-14

Abandoned underground tank #442 (NAS)

Description: This is a steel tank with a capacity less than 1,000 gallons. It is unknown if the tank is single walled (most likely), lined or if it has corrosion protection.

Date of Start Up: Unknown.

Date of Closure: This tank is scheduled for closure.

Type of Waste: The tank contains about 60 gallons of diesel + water.

Waste Management: The wastes was presumably pumped into tankers and disposed.

History of Releases: None known.

Results of VSI: This tank was not visited because it was in near Building 420 area.

Conclusions: This tank is a SWMU. A MEDIUM priority for an RFI is recommended for this tank. There are not enough data regarding this unit to determine the condition of the tank through its active life. The tank may have corroded and some leaking may have occurred.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Abandoned underground tank #473 (NADEP)

Description: This tank is a 250 gallon underground steel tank located south of Building 473, adjacent to the fence. This tank is single walled and unlined. It is not known if it has corrosion protection. It has no leak detection system.

Date of Start Up: Tank was installed in 1948.

Date of Closure: This tank was emptied in 11/20/89.

Type of Waste: This tank used to hold fuel (most like diesel). This tank is currently empty.

Waste Management: The tank held product.

History of Releases: None known.

Results of VSI: Tank is abandoned.

Conclusions: This tank is not a SWMU and further investigation is recommended. There are too many unknown factors regarding this tank. Therefore, it is recommended that it is considered as an AOC.

There is low potential for releases into the surface waters because the tank is underground.

There is a low potential for releases into the air because the tank is underground.

There is a low potential for surface gas releases into the air because the tank is not a landfill.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

SWMU# UST-16

Abandoned underground tank #506 (NAS)

Description: This is a 1,000 gallon steel tank. It is not known if the tank is single walled (most likely), lined or if it has corrosion protection.

Date of Start Up: Unknown.

Date of Closure: This tank is scheduled for closure.

Type of waste: About 800 gallons of waste oil are in the tank.

Waste Management: The waste oil was pumped into tankers and disposed off-site.

History of Releases: None known.

Results of VSI: This tank was not found. The tank is reportedly located south of the Commissary.

Conclusions: This tank is a SWMU. A MEDIUM priority for an RFI is recommended for this tank. There are not enough data regarding this unit to determine the condition of the tank. The tank may have corroded and some leaking may have occurred during its active life and it was not detected.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

SWMU# UST-19

Active tanks #615-1,2 and abandoned tank #615-3 (NADEP)

Description: Tank 615-1 is a 10,000 gallon underground steel tank. The tank has a phenolic lining, single wall and it is not known if there is a any corrosion protection. This tank serves as a spill control for Building 615.

Tank 615-2 is a 5,000 gallon underground stainless steel tank. The tank is single walled. It is unknown if the tank has corrosion protection or a lining. This tank serves as a spill control for Building 615.

Tank 615-3 is a 1,000 gallon underground steel tank. The tank is single walled. It is unknown if the tank has corrosion protection or a lining.

Date of Start Up: Tank 615-1 and tank 615-2 were installed in 1981. Start up of tank 615-3 is unknown.

Date of Closure: These tanks are not scheduled for closure. However, NADEP is trying to get a variance from the county. The variance is to exempt the tanks from being considered USTs.

Tank 615-3 was emptied on 11/20/89.

Type of waste: Tanks 615-1,2 is empty because it is only used for emergencies. Tank 615-3 is empty but it used to contain diesel waste.

Waste Management: The tanks are used for spill-control. For example, if the sprinkler in Building 615 is activated, the wastewater will be put in the tanks. The wastewater will be hauled away immediately.

History of Releases: None known.

Results of VSI: These tanks are underground. Tanks 615-1 and 2 are in front of Building 615, under Avenue F. Tank 615-3 is also under Avenue F but about 70' east of Building 615.

Conclusions: Tanks 615-1 and 615-2 have a low potential for releases into the soil and groundwater because they are only used for emergencies. However, Tank 615-3 is a SWMU and a MEDIUM priority for an RFI is recommended because

there are too many unknown factors. The age of 615-3 is unknown and leaking could have occurred without the facility being aware of it. The tank has not been pressure tested.

There is low potential for releases into the surface waters because the tanks are empty and are underground.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

There is a low potential for releases into the air because the tanks are underground.

There is a low potential for surface gas releases into the air because these tanks are not a landfill.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Abandoned underground tank #AV Lube 1 and 2 (NAS)

Description: AV Lube 1 is a 22,000 gallon steel tank. The type of system, interior lining and corrosion protection are unknown. Nothing is known about the piping. There is no leak detection system in place. This tank stored auto lubricant and is currently holding about ten gallons of lubricant. This tank is scheduled to be closed.

AV Lube 2 is 2,200 gallon single walled, steel tank. Interior lining and corrosion protection is unknown. Nothing is known about the piping. This tank is empty and is scheduled to be closed.

Date of Start UP: Unknown for both tanks.

Date of Closure: Not yet determined.

Type of Waste: AV Lube 1 contains about 10 gallons of automotive lubricant. AV Lube 2 is empty. Its previous contents are unknown.

Waste Management: Waste was pumped into tanker for disposal.

History of Releases: None known.

Results of VSI: The tanks are underground. Photographs were taken.

Conclusions: Tank AV Lube 1 is not a SWMU and further investigation is needed because there is not enough information is available. It cannot be determined from the data available if Tank AV Lube 2 is a SWMU. It is the lack of information that justifies the recommendation of designating these tanks as an AOC.



~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Abandoned underground tank #FS (NAS)

Description: This is a 1,000 gallon steel tank. It is unknown if the tank is single walled, lined or if there is a corrosion protection.

Date of Start Up: Unknown.

Date of Closure: This tank is scheduled to be closed.

Type of Waste: Records show that the tank contains about 700 gallons of water+product. Product is presumed to be diesel fuel.

Waste Management: Tank was used to store product.

History of Releases: None known.

Results of VSI: This tank is underground but about 10 feet from the Oakland Estuary.

Conclusions: This tank is not a SWMU and further investigation is needed. This tank is recommended as an AOC because of the lack of data and its proximity to the Oakland Estuary.

~~NAS ALAMEDA RCRA FACILITY ASSESSMENT~~

Building 397

Description: This building tests aircraft engines. Oil and fuel from the engines leak and are collected into sumps and then washed, pumped and treated in oil-water separators outside of the building. Fuel lines are connected to the building and on March 1, 1991, a leak occurred releasing several thousand gallons of fuel into a secondary containment and plugged up sewers. The spill was mitigated, and soil and groundwater investigations are underway to mitigate any contamination.

Date of Start Up: The building has been around since the 1950s but the oil-water separators were installed in 1990.

Date of Closure: This building is not scheduled to be closed.

Type of Waste: oil and fuel from the engines.

Waste Management: The dewatered oil and fuel are put in drums and are either recycled or disposed off-site, depending on the composition. Before installing the oil-water separators, the water/fuel/oil waste was discharged into the sewer. The POTW ordered the station to stop. The sewer line was plugged-up.

History of Releases: There was a jet fuel release on March 1, 1991. An initial report said that 17,000 gallons was released, but may have been overestimated because of the heavy rains. The containment berms could not hold the leak due to the heavy rains and the contaminated waters reached the industrial and storm sewers. The sewers were plugged and therefore acted as containment tanks. The contaminated water was skimmed from the sumps and sewer manholes and processed into the oil-water separator.

Results of VSI: Oil-water separators are in good shape, and there are no signs of the spill.

Conclusions: The area is still under investigation by the Navy to determine the extent of the contamination. It is recommended that the Building 397 and the surrounding area is considered an AOC until investigations prove otherwise.

[illegible]

## **Appendix 4 Permit Modification History**

### xxxxx 2003 - Class 3 Permit Modification

In June 2001 the City of Alameda acquired ownership of the 87- acre East Housing parcel. On April 8, 2003, the City of Alameda requested a Class 3 Permit Modification to re-define the permitted facility boundary and to exclude the East Housing parcel from the permit.

On .....(date) ....DTSC approved the modification request based on the fact the East Housing parcel never included Hazardous Waste Management Units nor Solid Waste Management Units. There are no remaining corrective action requirements for the East Housing parcel. Therefore DTSC terminated corrective action for the East Housing parcel and excluded the parcel from the facility boundary.

## **APPENDIX 5**

### **CHANGES MADE IN THE .....MODIFIED PERMIT**

1. Cover page – changed to the new format
2. Changed from “the Department’ to “DTSC” throughout the entire document
3. Table of Contents - added Appendix 4 and Appendix 5
4. I.B. - changed to read “DTSC issued a Negative Declaration for the initial permit and a Statement of Findings and a Notice of Determination for the modification to the permit.”
5. Appendix 1 – deleted the old map and included a new map
6. Appendix 2 – deleted the heading “NAS ALAMEDA RCRA FACILITY ASSESSMENT”
7. Added Appendix 4
8. Added Appendix 5